

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1166			Fuller Deposition, 01/11/2016 - Exhibit 142 - 5/2/2002 E-mail from Carol Vierling to Aymee Berry and Kay Fuller Re. "Package"
1167			Fuller Deposition, 01/11/2016 - Exhibit 143 - 5/6/2002 E-mail from Carol Vierling to Kay Fuller Re. "Fwd: Conference Call Meeting Minutes"
1168			Fuller Deposition, 01/11/2016 - Exhibit 144 - 6/11/2002 E-mail from Kay Fuller to Mary Edwards and Carol Vierling Re. "Agenda for Thurs and Fri."
1169			Fuller Deposition, 01/11/2016 - Exhibit 146 - 7/17/2002 E-mail b/w Mary Edwards, Kay Fuller, and Robert Carr Re. "RF Special 510k Number Issued 7/11/02!"
1170			Fuller Deposition, 01/11/2016 - Exhibit 147 - 7/17/2002 Memo from Kay Fuller to Mary Edwards Re. "Top Regulatory Affairs PV Goals: Status Update"
1171			Fuller Deposition, 01/11/2016 - Exhibit 148 - 7/21/2002 Memo from Kay Fuller to Mary Edwards Re. "Regulatory Affairs Project Status"
1172			Fuller Deposition, 01/11/2016 - Exhibit 149 - Recovery Meeting Minutes, dated 7/23/2002, from Rob Carr to Kathy Czelusniak, Mary Edwards, Janet Hudnall, and Doug Uelmen
1173			Fuller Deposition, 01/11/2016 - Exhibit 150 - 7/28/2002 Memo from Kay Fuller to Mary Edwards Re. "Recovery Filter 510(k) Submission Projects: Weekly Update", briefing the status of the Recovery 510(k) submission project to date
1174			Fuller Deposition, 01/11/2016 - Exhibit 151 - 8/6/2002 E-mail exchange b/w Aymee Berry, Michelle Johnsen, and Peter Fox Re. "Sample Request (021-IMPRA-6)"

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1175			Fuller Deposition, 01/11/2016 - Exhibit 152 - 8/5/2002 FDA Letter to Kay Fuller Re. K022236, Recovery Filter System (RF-048F)
1176			Fuller Deposition, 01/11/2016 - Exhibit 153 - 8/5/2002 Fax from Kay Fuller to Susan Alpert, forwarding the 8/5/2002 FDA Letter Re. K022236, Recovery Filter System (RF-048F)
1177			Fuller Deposition, 01/11/2016 - Exhibit 154 - 8/6/2002 E-mail exchange b/w Mary Edwards and Kay Fuller Re. "K022236 - Bard Recovery Filter System"
1178			Fuller Deposition, 01/11/2016 - Exhibit 155 - 8/8/2002 E-mail from Kay Fuller to Uelmen and Buchanan-Kopp Re. "RF Test Reports needed ASAP"
1179			Fuller Deposition, 01/11/2016 - Exhibit 156 - Draft kf 1.0 of the Response Letter to FDA's 8/5/2002 request for additional information regarding the Special 510(k), dated 8/11/2002
1180			Fuller Deposition, 01/11/2016 - Exhibit 157 - 8/12/2002 Memo from Lynne Buchanan-Kopp, CQE to Kay Fuller Re. "Enclosed documents", enclosing 14 documents - protocols and test reports that would assist Fuller with the response to the FDA
1181			Fuller Deposition, 01/11/2016 - Exhibit 158 - Document entitled "FDA 8 a.m. Teleconference - 8/12/02, Clinical Testing", with handwritten notes on the draft of the responses to the FDA's questions regarding the Recovery 510(k)
1182			Fuller Deposition, 01/11/2016 - Exhibit 159 - 8/20/2002 E-mail b/w Lynne Buchanan-Kopp, Mary Edwards, and many others Re. "Recovery Filter Design Review",
1183			Fuller Deposition, 01/11/2016 - Exhibit 160 - 8/26/2002 E-mail from Kay Fuller to Mary Edwards Re. "Response Letter update"

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1184			Fuller Deposition, 01/11/2016 - Exhibit 161 - 8/28/2002 Handwritten note by Kay Fuller titled "FDA Phone Contact Re. K022236 RF Response Letter"
1185			Fuller Deposition, 01/11/2016 - Exhibit 162 - 8/29/2002 "Urgent" E-mail from Kay Fuller to James Adwers, M.D. and Tracey Reyes Re. "2nd Response version, disregard my first e-mail"
1186			Fuller Deposition, 01/11/2016 - Exhibit 163 - 8/29-8/30/2002 E-mail exchange b/w Kay Fuller, Paul Kowalczyk, and James Adwers, with Kowalczyk and Adwers' comments and edits to the FDA's 8/5/2002 request for additional information regarding the Special 510(k)
1187			Fuller Deposition, 01/11/2016 - Exhibit 164 - 9/2/2002 Fax from Kay Fuller to Susan Alpert with Draft kf 2.8 of the Response Letter to BPV's 8/5/2002 request for additional information regarding the Special 510(k)
1188			Fuller Deposition, 01/11/2016 - Exhibit 165 - 8/30/2002 Letter to Elisa Harvey, DVM, PhD at FDA Re. K022236: Bard Recovery Filter System
1189			Fuller Deposition, 01/11/2016 - Exhibit 166 - 9/4-9/5/2002 E-mail b/w Kay Fuller and Mary Edwards Re. "Congratulations and Dossiers", with Edwards congratulating Fuller on getting the Recovery response out and requesting that she now help with other projects
1190			Fuller Deposition, 01/11/2016 - Exhibit 167 - 9/5/2002 E-mail from Kay Fuller to Mary Edwards and John McDermott Re. "K022236 FDA Response update"
1191			Fuller Deposition, 01/11/2016 - Exhibit 168 - 9/24/2002 E-mail from Kay Fuller to Mary Edwards Re. "FWD: ISET Meeting - Jan 19-23, 2003, Miami, FL"

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1192			Fuller Deposition, 01/11/2016 - Exhibit 169 - 10/25/2002 Letter to Elisa Harvey, DVM, PhD at FDA Re. "K022236/S2 Bard Recovery Filter System, Model RF-048F"
1193			Fuller Deposition, 01/11/2016 - Exhibit 170 - 11/27/2002 Fax from Kay Fuller to Marjorie Shrilman Re. "K022236 SE w/ Limitation"
1194			Fuller Deposition, 01/11/2016 - Exhibit 171 - 1/27/2003 E-mail exchange b/w Mary Edwards and Kay Fuller Re. "News from FDA?"
1195			Fuller Deposition, 11/09/2010 - Exhibit 01 - 7/10/2002 Letter to FDA submitting the Special 510(k): Device Modification application for the Recovery Filter System, detailing the modifications made to the Simon Nitinol filter and delivery system; signed by Kay Fuller and Carol Vierling
1196			Fuller Deposition, 11/09/2010 - Exhibit 02 - Complete Special 510(k): Device Modification submission for the Recovery Filter System, submitted 7/8/2002
1197			Fuller Deposition, 11/09/2010 - Exhibit 03 - 8/5/2002 FDA Letter to Kay Fuller Re. K022236, Recovery Filter System (RF-048F)
1198			Fuller Deposition, 11/09/2010 - Exhibit 04 - 8/26/2002 E-mail from Kay Fuller to Mary Edwards Re. "Response Letter update"
1199			Fuller Deposition, 11/09/2010 - Exhibit 05 - Draft kf 2.1 of the Response Letter to BPV's 8/5/2002 request for additional information regarding the Special 510(k)
1200			Fuller Deposition, 11/09/2010 - Exhibit 06 - 9/2/2002 Fax from Kay Fuller to Susan Alpert with Draft kf 2.8 of the Response Letter to BPV's 8/5/2002

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1201			Fuller Deposition, 11/09/2010 - Exhibit 07 - 8/29/2002 "Urgent" E-mail from Kay Fuller to James Adwers, M.D. and Tracey Reyes
1202			Fuller Deposition, 11/09/2010 - Exhibit 08 - Draft Responses for Teleconference Discussion with FDA Reviewers Regarding FDA Questions to Bard Recovery Filter System Response Letter (K022236), sent by Kay Fuller via e-mail to Dr. Elisa Harvey and Dr. Tara Ryan on 10/2/2002
1203			Fuller Deposition, 11/09/2010 - Exhibit 09 - Cover page of "Live Case" presentation by Dr. Asch with handwritten reminder notes and an 11/13/2002 "Urgent" e-mail exchange b/w Paul Kowakzyk and Kay Fuller Re: "Fwd[2]: Booth Graphic for Live Case"
1204			Fuller Deposition, 11/09/2010 - Exhibit 10 - Handwritten notes and 11/13/2002 E-mail from Kay Fuller to Mary Edward Re. "Booth Graphic for Live Case"
1205			Ganser Deposition, 02/28/2011 - Exhibit 01 - Report of the Product Audit of Bard Recovery Filter System, conducted at the Glens Falls Operations in NY from 7/19-7/23/2004
1206			Ganser Deposition, 02/28/2011 - Exhibit 02 - 11/16/2005 E-mail exchange b/w Christopher Ganser and Walcott, with Schulz and Allen CC'ed, Re. "Gen 2 Devices".
1207			Ganser Deposition, 02/28/2011 - Exhibit 03 - 3/8/2004 Memo from Uelmen to Distribution Re. "Filter Migration Meeting Minutes of March 4, 2004"
1208			Ganser Deposition, 02/28/2011 - Exhibit 04 - 9/9-9/10/2004 E-mail exchanges b/w Ganser, Edwards, and Ciavarella Re. "Dear Doctor Letter"

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1209			Ganser Deposition, 02/28/2011 - Exhibit 05 - 10/14/2004 E-mail from Paula Pizzi to John McDermott Re. "Documents", attaching the Field Action presentation and Summary and the QPI for 2Q (attachment not included)
1210			Ganser Deposition, 02/28/2011 - Exhibit 06 - 8/24-8/26/2005 E-mail exchange b/w McDermott, Kellee Jones, and Rich Bliss (Consultant) Re. "Limb Detachment Report".
1211		9-2018	Ganser Deposition, 10/11/2016 - Exhibit 516 - 21 U.S.C.A. § 351, Adulterated Drugs and Devices, Effective 7/9/2012
1212			Ganser Deposition, 10/11/2016 - Exhibit 518 - June 2006 Article by Myerberg et al. entitled "Life-Threatening Malfunction of Implantable Cardiac Devices"
1213			Ganser Deposition, 10/11/2016 - Exhibit 519 - <i>Pharmacoepidemiology</i> , Fifth Edition, Edited by Brian L. Storm, M.D., Stephen E. Kimmel, M.D., and Sean Hennessy, PhD, published in 2012
1214		9-2018	Ganser Deposition, 10/11/2016 - Exhibit 523 - Several memos: (1) 12/8/2004 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - November 2004"; (2) 12/8/2005 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - November 2005"; (3) 2/10/2006 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - January 2006; and (4) 2/8/2007 BPV Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - January 2007 <i>Redacted</i>
1215			Ganser Deposition, 10/11/2016 - Exhibit 524 - PowerPoint Presentation entitled "BPV/ANGIOMED New Product Development Review Meeting on April 26, 2004"

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1216		9-25-18	Ganser Deposition, 10/11/2016 - Exhibit 526 - Regulatory Affairs Manual Re. "Product Remedial Actions", RA-STD-002 Rev. 08, dated 10/12/2000
1217			Ganser Deposition, 10/11/2016 - Exhibit 527 - 4/23/2004 E-mail from John Lehmann to Carr and Uelmen Re. "Draft data set for statistician"
1218			Ganser Deposition, 10/11/2016 - Exhibit 528 - Spreadsheets detailing the number and rate of fatalities for every filter type from Q2 2000 to Q1 2004, "Natalie's Reformat.xls."
1219		10-1-18	Ganser Deposition, 10/11/2016 - Exhibit 529 - 6/30/2004 Updated Health Hazard Evaluation from David Ciavarella, M.D. to Doug Uelmen Re. "Migration of Recovery Filter"
1220		9-26-18	Ganser Deposition, 10/11/2016 - Exhibit 530 - 8/25/2004 E-mail from Avijit Mukherjee to Robert Carr, Janet Hudnall Cced, Re. "Recovery Filter objective statement", proposing one objective statement for the Recovery Filter G1A project, which Hudnall thought sounded "great"
1221		9-25-18	Ganser Deposition, 10/11/2016 - Exhibit 533 - 2/15/2006 Health Hazard Evaluation from David Ciavarella to Gin Schulz Re. "G2 Inferior Vena Cava Filter - Migration"
1222		9-26-18	Ganser Deposition, 10/11/2016 - Exhibit 534 - PowerPoint Presentation for a meeting to analyze EVEREST and MAUDE data and provide justifications for proposed changes to G2 filter
1223			Ganser Deposition, 10/11/2016 - Exhibit 536 - Non-Party Christopher Ganser's Response to Non-Party Subpoena
1224			Ganser Deposition, 09/09/2013 - Exhibit 1 - 7/12/2004 e-mail from Ganser to Tim Ring and John Weiland, Executive Summary

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1225			Ganser Deposition, 09/09/2013 - Exhibit 2 - E-mail exchange b/w Brian Hudson, Christopher Ganser, Brian Barry, and John DeFord, with others CC'ed, from 1/19-1/20/2005
1226			Ganser Deposition, 09/09/2013 - Exhibit 3 - Avijit Mukherjee's 7/21/2005 e-mail to Hudson, Graves, Chanduszko, Karen Hutchinson, and Mark Wilson
1227			Garcia Deposition, 02/08/2011 - Exhibit 3 - BPV District Manager's 2006 Market Report from October 2006, Philadelphia District.
1228			Garcia Deposition, 02/08/2011 - Exhibit 4 - Carpenter, et al. October 2009 article in Insert to Endovascular Today , entitled "Anatomical Fixation in Challenging Aortic Anatomies"
1229			Garcia Deposition, 02/08/2011 - Exhibit 5 - Johnson, et al. August 2010 article entitled "The Safety and Effectiveness of the Retrievable Option Inferior Vena Cava Filter: A United States Prospective Multicenter Clinical Study"
1230			Garcia Deposition, 02/08/2011 - Exhibit 6 - Complication of e-mails from Mark Garcia to Jack Davis from 11/6/2010 to 1/14/2011, regarding taking his deposition and negotiating retainer/hourly fees. Garcia was initially hesitant: "I understand the importance of this concerning industry, but also recognize how such a suit is huge for you".
1231			Garcia Deposition, 02/08/2011 - Exhibit 7 - Grassi, et al. 2003 article entitled "Quality Improvement Guidelines for Percutaneous Permanent IVC Filter Placement for the Prevention of Pulmonary Embolism"

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1232			Garcia Deposition, 02/08/2011 - Exhibit 1 - Curriculum Vitae of Mark Joseph Garcia, M.D., F.S.I.R., Interventional and Diagnostic Radiologist at Christiana Care Health System and X-Ray Associates, PA since 1997
1233			Garcia Deposition, 02/08/2011 - Exhibit 2 - Saeed, et al. 2006 article entitled "Right Ventricular Migration of a Recovery IVC Filter's Fractured Wire with Subsequent Pericardial Tamponade"
1234			Gillette Deposition, 07/11/2014 - Exhibit 11 - 12/21/2004 E-mail from Mary Nielsen to many Re. "Nov.2004 Sales Rankings", Interventional Rankings for November
1235			Gillette Deposition, 07/11/2014 - Exhibit 13 - 12/9/2004 E-mail from Cindi Walcott to Brooke Gillette, addressed to All Territory Managers
1236			Gillette Deposition, 07/11/2014 - Exhibit 14 - 1/11/2005 E-mail exchange b/w Brooke Gillette and Cindi Walcott
1237			Gillette Deposition, 07/11/2014 - Exhibit 16 - 11/11/2005 E-mail from Jason Greer
1238			Gillette Deposition, 07/11/2014 - Exhibit 7 - 2/14/2005 E-mail from Shawn Fecher to Jack Sullivan and Mark Tinsley Re. "Filter Complications-Maude"
1239			Gillette Deposition, 07/11/2014 - Exhibit 1 - Plaintiff Melanie Rackliff's First Amended Notice of Deposition of Brooke Gillette, MBA, Territory Manager at BPV, and Request for Documents

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1240			Gillette Deposition, 07/11/2014 - Exhibit 3 - 2/24/2004 E-mail from Brooke Gillette to Dona Fiola Re. "Training letter for Brooke G- THANKS!", attaching a letter for Dr. James Gray, Medical Director at Hillcrest Baptist Medical Center, to be sent to him ASAP, introducing the Recovery filter and informing him that the Trauma Services Dept. at Hillcrest has received special training to place and remove the Recovery Filter. "The Recovery filter technology provides benefits...that promises to become the "gold standard" in PE prevention".
1241			Gillette Deposition, 07/11/2014 - Exhibit 4 - 3/16/2004 E-mail from Brooke Gillette to Dona Fiola Re. "Hi and favor for Brooke", requesting that Dona send a bariatric surgeon Recovery letter to Dr. Todd McCarthy, Dr. Jeffery Lamont, Dr. Joseph Kuhn, Dr. Nick Nicholson, and Dr. David Arnold; letter not included in exhibit.
1242			Gillette Deposition, 07/11/2014 - Exhibit 5 - 5/10/2005 E-mail from Brooke Gillette to Zona Michelena Re. "VA Cone Form", attaching the Recovery Cone Qualification Form to be sent to Dr. Lopez and requesting that the VA be added to the "ok" list ASAP, as they have "placed an order and have a high profile retrieval case coming up".
1243			Gillette Deposition, 07/11/2014, Exhibit 12 - 7/21/2005 E-mail from Jack Sullivan to Janet Hudnall Re. "FAQs and Answers"
1244			Gillette Deposition, 07/11/2014, Exhibit 15 - Information for Use - Recovery Filter System, Labeling Issue Date: December 2003

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1245			Glass Deposition, 09/23/2016 - Exhibit 468 - Documents pertaining to Bard's liability policy with AIG Excess Casualty and Lexington Insurance Company
1246			Glass Deposition, 09/23/2016 - Exhibit 469 - Corporate Copy Approval Form, Copy No. 9602, with 2/13/2004 E-mail from Mary Edwards to Several Re. "email to sales force"
1247			Glass Deposition, 09/23/2016 - Exhibit 470 - Document entitled "Standby Statement For Corporate Copy Review Process"
1248			Glass Deposition, 09/23/2016 - Exhibit 471 - 2/13/2004 E-mail from Mary Edwards Re. "email to sales force"
1249			Glass Deposition, 09/23/2016 - Exhibit 472 - 2/26/2004 E-mail from Holly Glass to Christopher Ganser and Doug Uelmen Re. "Crisis Communications Plan for Recovery"
1250			Glass Deposition, 09/23/2016 - Exhibit 473 - Agenda for the 3/4/2004 Recovery Filter Migration Meeting to be held at BPV in Tempe, AZ, circulated via e-mail by Kellee Jones on 3/2/2004
1251			Glass Deposition, 09/23/2016 - Exhibit 474 - Action Items and Meeting Minutes Memo from 3/4/2004 Recovery Filter Migration Meeting held to address the reported migration of a Recovery filter on 2/9/2004 and develop a remedial action plan, circulated via e-mail by Kellee Jones on 3/9/2004
1252			Glass Deposition, 09/23/2016 - Exhibit 475 - 3/12/2004 E-mail from Holly Glass to John Lehmann Re. "Recovery Crisis Communications Plan"
1253			Glass Deposition, 09/23/2016 - Exhibit 476 - 3/19/2006 E-mail from Shari Allen to John McDermott and Kevin Shifrin Re. "Recovery incident at Princess Alexandra Hospital Brisbane"

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1254			Glass Deposition, 09/23/2016 - Exhibit 477 - 2/12/2004 E-mail from Robert Carr to Edwards, Uelmen, Hudnall, and Hudson Re. "FW: Maude Update"
1255			Glass Deposition, 09/23/2016 - Exhibit 478 - 3/12/2004 E-mail from Holly Glass to Joe DeJohn Re. "Local Outreach on Recovery"
1256			Glass Deposition, 09/23/2016 - Exhibit 479 - 4/13/2004 Memo from Lee Lynch with Hill & Knowlton to Holly Glass Re. "Recovery Filter Crisis Communications Plan"
1257			Glass Deposition, 09/23/2016 - Exhibit 480 - 4/13/2004 E-mail from Lee Lynch to Glass, Passero, Lehmann, Hudnall, and Jones Re. "Crisis Plan and Supporting Documents for your review"
1258			Glass Deposition, 09/23/2016 - Exhibit 481 - 4/16/2004 E-mail from Holly Glass to Christopher Ganer and Doug Uelmen Re. "RF"
1259			Glass Deposition, 09/23/2016 - Exhibit 482 - 11/22/2005 E-mail from Holly Glass to Janet Hudnall Re. "Recovery Communications Plan"
1260			Glass Deposition, 09/23/2016 - Exhibit 483 - 5/11/2005 "Dear Colleague" letter from BPV, providing an internal analysis of reported adverse events related to the Recovery filter
1261			Glass Deposition, 09/23/2016 - Exhibit 484 - Final Bard "Dear Doctor" letter, signed by Janet Hudnall, and the Information for Use Update for the Recovery Filter System in English and other languages
1262			Glass Deposition, 09/23/2016 - Exhibit 485 - 3/13/2004 Invoice #162 from Lehmann Thomas to Chris Ganer for 2/2-2/27/2014 hours

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1263			Goodrow Deposition, 03/18/2014 - Exhibit 01 - Plaintiff Mary Giordano's (On Behalf of the Estate of Jacqueline Keith) Notice of Deposition of Chris Goodrow
1264			Goodrow Deposition, 03/18/2014 - Exhibit 03 - 1/15/2008 FDA Letter re. Clearance for Bard Recovery G2 Filter System, K073090, with 510(k) Summary of Safety and Effectiveness Information
1265			Goodrow Deposition, 03/18/2014 - Exhibit 04 - Chart entitled Marketing Initiatives
1266			Goodrow Deposition, 03/18/2014 - Exhibit 05 - 10/1/2008 E-mail from JoAnn Dirladian to Many Re. "Bard Peripheral Vascular Monthly Meetings/Conventions Calendar"
1267			Goodrow Deposition, 03/18/2014 - Exhibit 06 - 1/13/2005 E-mail from Chris Goodrow to Dona Fiola
1268			Goodrow Deposition, 03/18/2014 - Exhibit 07 - 6/24/2004 E-mail from Chris Goodrow to Zona Michelena
1269			Goodrow Deposition, 03/18/2014 - Exhibit 08 - Recovery Workshop General Contact Information, dated 10/13/2004, for the MERI Facility in Memphis, TN.
1270			Goodrow Deposition, 03/18/2014 - Exhibit 09 - 5/10/2004 E-mail from Sue Hohmann to many Re. "SVS Details"
1271			Goodrow Deposition, 03/18/2014 - Exhibit 11 - Meeting Supply Form for 6/14-6/16/2004 Meeting with the American Society for Bariatric Surgery (ASBS) in San Diego, CA, captioned by Chris Goodrow.
1272			Goodrow Deposition, 03/18/2014 - Exhibit 16 - 10/2/2004 E-mail from Chris Goodrow to Janet Hudnall Re. "Filter customers"
1273			Goodrow Deposition, 03/18/2014 - Exhibit 17 - 3/15/2005 E-mail from Robert DeLeon to Janet Hudnall

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1274			Goodrow Deposition, 03/18/2014 - Exhibit 19 - Chart entitled "Western Region: G1A Recovery "Discussion" Customer's - Priority Accounts"
1275			Goodrow Deposition, 03/18/2014 - Exhibit 21 - 1/14/2010 FDA Letter re. Clearance for Bard Eclipse Filter System, K093659, with 510(k) Summary of Safety and Effectiveness Information
1276			Goodrow Deposition, 03/18/2014 - Exhibit 22 - U.S. Sales Training Manual for the G2 Filter System for Permanent Placement, including market overview (with graphs), product description, design modifications, positioning, features and benefits, competitive review, ordering information, and talking points; and the "Guide to Tactical Programs" for the G2 Filter System for Permanent Placement
1277			Goodrow Deposition, 03/18/2014 - Exhibit 25 - 11/8/2010 Memo from Jim Beasley to Tim Ring Re. Monthly Management Report
1278			Goodrow Deposition, 03/18/2014 - Exhibit 26 - Complaint File No. 234956/RF320J opened on 8/7/2009
1279			Goodrow Deposition, 03/18/2014 - Exhibit 27 Redacted Autopsy Report from the City and County of Honolulu, dated 8/4/2009.
1280			Goodrow Deposition, 03/18/2014 - Exhibit 28 - Complaint File No. 47413/RF048F opened on 6/1/2005
1281			Goodrow Deposition, 03/18/2014 - Exhibit 29 - 2009 Hull and Robertson article entitled "Bard Recovery Filter: Evaluation and Management of Vena Cava Limb Perforation, Fracture, and Migration"
1282			Exhibit Number Skipped
1283			Exhibit Number Skipped
1284			Exhibit Number Skipped
1285			Exhibit Number Skipped

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1286			Exhibit Number Skipped
1287			Exhibit Number Skipped
1288			Exhibit Number Skipped
1289			Exhibit Number Skipped
1290			Exhibit Number Skipped
1291			Exhibit Number Skipped
1292			Graves Deposition, 02/27/2014 - Exhibit 07 - 1/14/2005 E-mail from Brian Hudson to Many
1293			Graves Deposition, 02/27/2014 - Exhibit 08 - BPV Engineering Test Report - Characterization of Recovery Filter Migration Resistance When Recovery Filter is Tilted, Phase 2, ETR-04-03-18, Rev 0
1294			Graves Deposition, 02/27/2014 - Exhibit 09 - Addendum to BPV Remedial Action Plan - "Limb Fractures of Recovery Filter", SPA 04-04-01, Revised 2/27/2006
1295		9-20-18	Graves Deposition, 02/27/2014 - Exhibit 10 - 3/23/2006 E-mail exchange b/w Mickey Graves and Charlie Simpson, FEA on G2, regarding Historical FEA analysis
1296			Graves Deposition 02/27/2014 - Exhibit 03 - 7/15/2004 E-mail from Hudnall to TPE-Interventional Sales-DG
1297			Greer Deposition, 06/20/2010 - Exhibit 01 - Plaintiff Thomas Lindsay's Amended Notice of Deposition of Jason Greer
1298			Greer Deposition, 08/11/2014 - Exhibit 01 - Plaintiff Tina Barkley's Sixth Amended Notice of the Deposition of Jason Greer and RFP
1299			Greer Deposition, 08/11/2014 - Exhibit 03 - 7/25/2003 FDA Letter re. Clearance for Bard Recovery Filter System, K031328, with 510(k) Summary of Safety and Effectiveness Information
1300			Greer Deposition, 08/11/2014 - Exhibit 04 - 3/7/2004 E-mail from Mark Tinsley to Jason Greer and Jack Sullivan

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1301			Greer Deposition, 08/11/2014 - Exhibit 05 - 8/30/2004 E-mail from Jason Greer
1302			Greer Deposition, 08/11/2014 - Exhibit 06 - 2003 Projection for Territory 520
1303			Greer Deposition, 08/11/2014 - Exhibit 08 - "Background on Recovery" Outline from Tony VenBrux, Director of Interventional Radiology
1304			Greer Deposition, 08/11/2014 - Exhibit 11 - 7/9/2004 E-mail from Janet Hudnall from Janet Hudnall to Mark Tinsley Subject: Recovery
1305			Greer Deposition, 09/26/2011 - Exhibit 09 - Updated Health Hazard Evaluation Memo from Ciavarella to Uelmen, Re: "Limb Fractures of Recovery Filter", dated 11/17/2004.
1306			Greer Deposition, 09/26/2011 - Exhibit 10 - Protocol of "Correlation of BMI vs. Vena Cava Size" Study by University of Texas Medical School
1307			Greer Deposition, 09/26/2011 - Exhibit 12 - Production of the materials shown to Jason Greer at the time of his termination
1308			Greer Deposition, 09/26/2011 - Exhibit 14 - 9/16/2006 E-mail from Jason Greer to several Re. "FW: Filter Talking Points"
1309			Greer Deposition, 09/26/2011 - Exhibit 15 - 9/9/2006 E-mail exchange b/w Jason Greer and Mark Cumming
1310			Greer Deposition, 09/26/2011 - Exhibit 16 - FAQs Chart about the Recovery G2
1311			Greer Deposition, 09/26/2011 - Exhibit 18 - BPV District Manager's 2006 Market Report from October 2006, Philadelphia District.
1312			Greer Deposition, 09/26/2011 - Exhibit 19 - 9/12/2006 E-mail exchange b/w Jason Greer and Janet Hudnall

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1313			Greer Deposition, 09/26/2011 - Exhibit 20 - Questions and answers to the "Pre-Lab Test" pertaining to the Recovery filter
1314			Greer Deposition, 09/26/2011 - Exhibit 21 - 8/9/2005 E-mail from Jason Greer to Many
1315			Greer Deposition, 09/26/2011 - Exhibit 22 - 12/21/2004 "High" Importance E-mail from Cindi Walcott to Joe DeJohn Re. "IFU Communication Issues"
1316			Greer Deposition, 09/26/2011 - Exhibit 23 - 10/6-10/9/2006 E-mail exchange b/w Jason Greer and Rick Morton
1317			Greer Deposition, 10/22/2010 - Exhibit 02 - Patient Brochure on the Recovery Filter, entitled "Pulmonary Embolism and Vena Cava Filters: A Patient's Guide to the Recovery Vena Cava Filter", provided by Dr. Greer and Dr. David Peeler of the Interventional Radiology Dept.
1318			Greer Deposition, 10/22/2010 - Exhibit 03 - 12/22/2005 E-mail from Jason Greer to Joel Perchick
1319			Greer Deposition, 10/22/2010 - Exhibit 06 - Typed notes of examples of off-label training at National Sales Meeting, Physician Trainings, and others
1320			Greer Deposition, 10/22/2010 - Exhibit 08 - 4/18-4/27/2008 E-mail exchange between Jason Greer and Mark Kleiman
1321			Harvey Deposition, 06/20/2017, Exhibit 01 - Plaintiffs' Notice of Videotaped Deposition of Richard Harvey, MD
1322			Harvey Deposition, 06/20/2017, Exhibit 02 - Curriculum Vitae Richard L. Harvey, M.D., FACS
1323			Harvey Deposition, 06/20/2017, Exhibit 03 - Medical Records, CTS-Harvey's records re treatment

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1324			Harvey Deposition, 06/20/2017, Exhibit 04 - Medical Records, Consult note from Langford (Harvey's partner) 07/08/2014
1325			Harvey Deposition, 06/20/2017, Exhibit 05 - Medical Records, Consult note 07/27/2014 after patient in hospital re need for surgery to remove strut from heart
1326			Harvey Deposition, 06/20/2017, Exhibit 06 - Medical Record, Consent for Surgery-open heart procedure 07/24/2014
1327			Harvey Deposition, 06/20/2017, Exhibit 07 - Medical Record, Op Report of Harvey 07/28/2014-open heart procedure
1328			Harvey Deposition, 06/20/2017, Exhibit 08 - Medical Record, Pathology Report on removed strut 07/29/2014
1329			Harvey Deposition, 06/20/2017, Exhibit 09 - Medical Record, Cardiopulmonary Record (heart-lung machine)
1330			Harvey Deposition, 06/20/2017, Exhibit 11 - Medical Record, daily progress note of 07/30/2014 visit to patient in hospital
1331			Harvey Deposition, 06/20/2017, Exhibit 12 - Medical Record, daily progress note of day of discharge-patient stable 08/02/2014
1332			Harvey Deposition, 06/20/2017, Exhibit 13 - Medical Record, Radiology report Gwinnett 07/24/2014-CT
1333			Hudnall Deposition, 11/01/2013 - Exhibit 31 - Summary of Sales and Adverse Events for all competitors from 01/00 through Q1/04
1334			Hudnall Deposition, 11/01/2013 - Exhibit 33 - 3/2-3/3/2011 E-mail Re. "BARD IVC Filter Event Report"; Email exchange between Ben Haygood and John Worland: No significant difference between the adverse events of the Recovery and Vena Cava filters

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1335		9-26-18	Hudnall Deposition, 11/01/2013, Exhibit 21 - Brochure - Recovery Cone Removal System
1336		9-26-18	Hudnall Deposition, 11/01/2013, Exhibit 22 - Recovery G2 Filter System brochure
1337		9-26-18	Hudnall Deposition, 11/01/2013, Exhibit 23 - G2 Brochure (permanent) - Patient Questions & Answers and Bard's website page about G2 Filter System, Indicated for removal, 6/10/2010
1338			Hudnall Deposition, 11/01/2013, Exhibit 28 - 7/8/2004 E-mail from McDermott to Carr, Edwards, Hudnall, DeCant, and Uelmen Re. "Latest HHE"
1339		9-26-18 Redacted	Hudnall Deposition, 11/01/2013, Exhibit 29 - 7/6/2004 E-mail exchange b/w Hudnall and Bob Cortelezzi Re. "Maude Website Discussion"
1340			Hudnall Deposition, 11/03/2010 - Exhibit 02 - 7/1/2005 "High" Importance E-mail from Hudnall
1341			Hudnall Deposition, 11/03/2010 - Exhibit 04 - Document entitled "Preparation for Grand Jury Testimony by Defense Counsel"
1342			Hudnall Deposition, 11/03/2010 - Exhibit 05 - BPV District Manager's 2005 Market Report from February 2005
1343			Hudnall Deposition, 11/03/2010 - Exhibit 06 - 6/4/2004 E-mail from Uelmen to Hudnall, McDermott, Edwards, Shifrin, and DeCant
1344			Hudnall Deposition, 11/03/2010 - Exhibit 07 - PowerPoint presentation
1345			Hudnall Deposition, 11/03/2010 - Exhibit 08 - 10/6/2006 E-mail exchange b/w Jason Greer and Janet Hudnall
1346			Hudnall Deposition, 11/03/2010 - Exhibit 09 - End User Evaluation of the G1A Filter & Short Cone conducted 2/2-2/4/2005 by Janet Hudnall

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1347			Hudnall Deposition, 11/03/2010 - Exhibit 10 - 12/27/2004 E-mail from Brian Brown to Robert Carr and Janet Hudnall
1348			Hudnall Deposition, 11/03/2010 - Exhibit 12 - 4/25/2005 E-mail from Janet Hudnall to Karen Hutchinson and Robert Carr
1349			Hudnall Deposition, 11/03/2010 - Exhibit 13 - 11/1/2004 E-mail from Janet Hudnall to Robert Carr Re. "2004 Bard Vena Cava Filter Questionnaire"
1350			Hudnall Deposition, 11/03/2010 - Exhibit 14 - 9/9-9/13/2004 E-mails b/w Robert Lerdahl, Brad Hubbard, and Janet Hudnall Re. "Animal Use Proposal"
1351			Hudnall Deposition, 11/03/2010, Exhibit 01 - "Recovery Filter" PowerPoint Presentation by Janet Hudnall, Marketing Manager of IVC filters
1352			Hudson Deposition, 01/21/2011 - Exhibit 01 - 7/19/2005 E-mail from Rich Bliss to Brian Hudson and Kereshmeh Shahriari
1353			Hudson Deposition, 01/21/2011 - Exhibit 02 - Draft of Technical Report 11-0245-00-TR-002, Rev. 0, entitled "Evaluation of Two Production Lot Vena Cava Filters and One Test Piece"
1354			Hudson Deposition, 01/21/2011 - Exhibit 03 - 8/20/2004 Altran Corporation Letter to Don VonLinden at C.R. Bard Re. "Preliminary Hardness evaluation of wires from production lots RNF and SNF. Preliminary data on the additional scanning electron microscopic examination of arm wires from RF048, and preliminary data on the evaluation of NMT RNF arm wires" (11-0245-00-L-004)
1355			Hudson Deposition, 01/21/2011 - Exhibit 05 - Appendix 12.1 for the G1A Recovery Filter Femoral System DV&V Protocol

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1356			Hudson Deposition, 01/21/2011 - Exhibit 06 - Collection of e-mails & 6/22/2005 and 6/27/2005 memo from Mickey Graves to Venus Snareable Filter Team Re. "Project No. 8031", with meeting minutes from a 6/21/2005 meeting and then the agenda for a 6/28/2005 meeting
1357			Hudson Deposition, 01/21/2011 - Exhibit 07 - Risk Assessment for the G1A Recovery Filter Femoral System, No. RA070025, Project No. 8027
1358			Hudson Deposition, 01/21/2011 - Exhibit 08 - Collection of e-mails: 6/28/2004 E-mail exchange b/w Andre Chanduszeko, Robert, Carr, and Brian Hudson
1359			Hudson Deposition, 01/21/2011 - Exhibit 09 - E-mail exchange b/w Brian Hudson, Christopher Ganser, Brian Barry, and John DeFord, with others CC'ed, from 1/19-1/25/2005 Re. "Proposed Recovery G1A Fast Track Test Plan attached, specifically in regards to migration testing and lack of criteria for "sausage casing" (although attachment not included in exhibit)
1360			Hudson Deposition, 01/21/2011 - Exhibit 10 - 8/11/2004 E-mail from Kelee Jones to Many Re. "Updated Fault Tree Analysis", attaching draft of the Recovery Filter Arm Fracture Fault Tree Analysis

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1361			Hudson Deposition, 01/21/2011 - Exhibit 11 - Collection of e-mails: 7/7/2004 E-mail from Robert Carr to Cindi Walcott Re. "Dr. Ciavarella Recovery Filter Questions", detailing the technical questions Dr. Ciavaralla had regarding the Recovery Filter detached limbs remedial action plan & HHE, with Carr's answers; 8/23/2004 E-mail from Uelmen to Several Re. "Filter Fracture Updates", detailing the investigation activities of the BPV filter fracture team; 7/27/2004 E-mail from Uelmen to Many Re. "Filter Fractures Meeting", following planning session for the Recovery Filter Action Plan to update the Risk Assessment based on current knowledge of the RNF and prepare a Fault Tree Analysis for the fractures; 9/20/2004 E-mail from Kellee Jones to several Re. "Altran Report", relaying that installment 1 of 2 of Altran's final report on RNF fractures had been downloaded; and 9/9/2004 E-mail from Brian Hudson to Cindi Walcott Re. "FIR-Fracture", attaching the latest version of the Failure Investigation Report on Recovery Filter - Fractures (FIR-04-09-01)
1362			Hudson Deposition, 01/21/2011 - Exhibit 12 - Emails Re. "RF Fracture Action Items"
1363			Hudson Deposition, 01/21/2011, Exhibit 13 - e-mails: 11/17/2004 E-mail from Avijit Mukherjee to Uelmen, Hudson, and Wilson forwarding "FDA Guidelines"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1364			Hudson Deposition, 01/17/2014 - Exhibit 01 - Resume of Brian Hudson, Employee of C.R. Bard from 1999 to August 2012 (starting as a Senior Technician Quality Engineer, advancing to Senior Risk Manager from June 2008 to October 2011 and Associate Director of Quality Assurance from October 2011-August 2012)
1365			Hudson Deposition, 01/17/2014 - Exhibit 02 Project Requirements Sheet for new product: Recovery Filter, Project No. 7081, Revision No. 3
1366			Hudson Deposition, 01/17/2014 - Exhibit 10 - Design Failure Mode and Effects Analysis for the Recovery Nitinol Filter, Doc No. DFMEA070010, Rev. 4
1367			Hudson Deposition, 01/17/2014 - Exhibit 11 - Patient Comparison Matrix for the Recovery Filter Detached Limbs, dated 11/1/2005
1368			Hudson Deposition, 01/17/2014 - Exhibit 15 - PowerPoint presentation entitled "Migration Presentation"
1369		9-27-18	Hudson Deposition, 01/17/2014 - Exhibit 16 - 3/24/2004 E-mail from Alex Tessmer to Charlie Benware and Ed Fitzpatrick Re. "Starguide Filter Migration Test Results"
1370			Hudson Deposition, 01/17/2014 - Exhibit 18 - 12/11/2003 E-mail exchange b/w Brian Hudson and Janet Hudnall, others CC'ed, Re. "Special Design Review for Recovery - Meeting Minutes".
1371			Hudson Deposition, 01/17/2014 - Exhibit 19 - Recovery Filter Migration Remedial Action Plan, dated 4/21/2004, SPA-04-04-02
1372			Hudson Deposition, 01/17/2014 - Exhibit 22 - E-mail, IVC products are high risk, dated 7/27/05

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1373			Hudson Deposition, 01/17/2014 - Exhibit 23 - Updated Health Hazard Evaluation Memo from Ciavarella to Uelmen, Re: "Migration of Recovery Filter", dated 6/30/2004.
1374			Hudson Deposition, 01/17/2014 - Exhibit 24 - Final Summary Report for the Recovery G2 Filter Study (EVEREST)
1375			Hudson Deposition, 01/17/2014 - Exhibit 3 Risk Management Division - Operating Procedure, pertaining to all BPV products (DOPN0700010, Rev. 3)
1376			Hudson Deposition, 01/17/2014 - Exhibit 4 - Risk Assessment Form for the Recovery Nitinol Vena Cava Filter, No. RA070011, Rev. 0
1377			Hudson Deposition, 01/17/2014 - Exhibit 5 - Failure Mode and Effects Analysis - Standard Operating Procedure, pertaining to all products/projects that are selected to use FMEA as their Risk Analysis Tool, SOPN070012
1378			Hudson Deposition, 01/17/2014 - Exhibit 6 - Design Failure Mode and Effects Analysis for the Recovery Nitinol Filter, Doc No. DFMEA070010, Rev. 0
1379			Hudson Deposition, 01/17/2014 - Exhibit 7 - Design Failure Mode and Effects Analysis for the Recovery Nitinol Filter, Doc No. F-8020, Rev. 000
1380			Hudson Deposition, 01/17/2014 - Exhibit 8 - Design Failure Mode and Effects Analysis for the Recovery Nitinol Filter, Doc No. DFMEA070010, Rev. 2
1381			Hudson Deposition, 01/17/2014 - Exhibit 9- Design Failure Mode and Effects Analysis for the Recovery Nitinol Filter, Doc No. DFMEA070010, Rev. 3
1382			Hudson Deposition, 01/17/2014, Exhibit 12 - "US FDA Clinical Data Summary of the Simon Nitinol Filter"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1383		9-2-18	Hudson Deposition, 01/17/2014, Exhibit 13 - BPV Engineering Test Report - Characterization of Recovery Filter Migration Resistance in Comparison to Competitive Product - Phase 1, ETR-04-03-02, Rev 0.
1384			Hurst Deposition, 8/19/2016 - Exhibit 1 - Defendant's Amended Notice of Deposition of Darren Hurst, M.D
1385			Exhibit Number Skipped
1386			Exhibit Number Skipped
1387			Exhibit Number Skipped
1388			Exhibit Number Skipped
1389			Exhibit Number Skipped
1390			Hurst Deposition, 08/19/2016 - Exhibit 8 - 6/16/2016 Letter from Mr. Johnson to Dr. Hurst
1391			Hurst Deposition, 08/19/2016 - Exhibit 9 - Article entitled "Quality Improvement Guidelines for Percutaneous Permanent IVC Filter Placement for the Prevention of Pulmonary Embolism"
1392			Hurst Deposition, 11/01/2016 - Exhibit 10 - Article entitled "Evidence-Based Evaluation of Inferior Vena Cava Filter Complications Based on Filter Type"
1393			Hurst Deposition, 11/01/2016 - Exhibit 11 - Article entitled "Technical Success and Safety of Retrieval of the G2 Filter in a Prospective, Multicenter Study"
1394			Hurst Deposition, 11/01/2016 - Exhibit 12 - Article entitled "Removal of the G2 Filter: Differences between Implantation Times Greater and Less than 180 Days"
1395			Hurst Deposition, 11/01/2016 - Exhibit 13 - Article entitled "Retrievability and Device-Related Complications of the G2 Filter: A Retrospective Study of 130 Filter Retrievals"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1396			Hurst Deposition, 11/01/2016 - Exhibit 14 - Article entitled "Recovery G2 Inferior Vena Cava Filter: Technical Success and Safety of Retrieval"
1397			Hurst Deposition, 11/01/2016 - Exhibit 17 - Document entitled "G2X Vena Cava Filter"
1398			Exhibit Number Skipped
1399			Hurst Deposition, 11/01/2016 - Exhibit 22 - Complications of the Nitinol Vena Cava Filter
1400			Exhibit Number Skipped
1401			Hurst Deposition, 11/01/2016 - Exhibit 26 - 1-Page Drawing, Ex. 26, Dr. Hurst, 11/1/16 deposition
1402			Hurst, 07/21/2017, Exhibit 1 - Defendants Notice of Depo
1403			Exhibit Number Skipped
1404			Exhibit Number Skipped
1405			Exhibit Number Skipped
1406			Exhibit Number Skipped
1407			Exhibit Number Skipped
1408			Exhibit Number Skipped
1409			Exhibit Number Skipped
1410			Exhibit Number Skipped
1411			Exhibit Number Skipped
1412			Exhibit Number Skipped
1413			Exhibit Number Skipped
1414			Exhibit Number Skipped
1415			Exhibit Number Skipped
1416			Exhibit Number Skipped
1417			Hurst, 08/07/2017, Exhibit 26 - Handwritten Notes (depo notes?)
1418			Kang Deposition, 06/15/2017, Exhibit 01 - Plaintiffs' Notice of Videotaped Deposition of Brandon Kang, M.D.
1419			Kang Deposition, 06/15/2017, Exhibit 02 - Curriculum Vitae Brandon Sang Joon Kang, M.D.
1420			Kang Deposition, 06/15/2017, Exhibit 03 - Medical Records-ER note of 06/26/2014 Gwinnett for abdominal pain

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1421			Kang Deposition, 06/15/2017, Exhibit 04 - medical records-Kang consultation 07/03/2014
1422			Kang Deposition, 06/15/2017, Exhibit 06 - Consent Form for IR procedure 07/23/2014
1423			Kang Deposition, 06/15/2017, Exhibit 07 - Kang procedure note from IR procedure 07/23/2014
1424			Kang Deposition, 06/15/2017, Exhibit 08 - Post procedure notes from GMC 07/23/2014
1425			Kang Deposition, 06/15/2017, Exhibit 09 - progress note of 07/24/2014 of Kang
1426			Kang Deposition, 06/15/2017, Exhibit 11 - Kang Twitter Post 04/07/2017 Filter Out; Filters save lives but should be removed as soon as the risk of PE is mitigated IRAD and cowboy icon
1427			Kang Deposition, 06/15/2017, Exhibit 12 - Kang Twitter Screen Shot of Account joined March 2017
1428			Kang Deposition, 06/15/2017, Exhibit 13 - heart diagram shown to Kang by Defendant
1429			Kang Deposition, 06/15/2017, Exhibit 14 - Twitter Post 05/22/2017 cowboy and lasso; filter out in less than 5 min #GTFO
1430			Kaufman Deposition, 10/28/2010 - Exhibit 10 - BPV District Manager's 2006 Market Report from October 2006, Philadelphia District.
1431			Kaufman Deposition, 10/28/2010 - Exhibit 11 - Complication of articles: Article Abstracts from SIR meeting Scientific Sessions on IVC filters; Asch, et al. 2002 article entitled "Initial Experience in Humans with a New Retrievable Inferior Vena Cava Filter"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1432			Kaufman Deposition, 10/28/2010 - Exhibit 12 - Complication of articles: Cantwell, et al. 2009 article entitled "Comparison of the Recovery and G2 Filter as Retrievable Inferior Vena Cava Filters"; FDA's article on "Removing Retrievable Inferior Vena Cava Filters: Initial Communication", issued 8/9/2010 on the U.S. FDA website; Grande et al. 2005 article entitled "Experience with the Recovery Filter as a Retrievable Inferior Vena Cava Filter"; Grande and Stavropoulos March 2006 article entitled "Retrievable inferior vena cava filters"; Hoppe, et al. July 2007 article entitled "Safety of Inferior Vena Cava Filter Retrieval in Anticoagulated Patients"
1433			Kaufman Deposition, 10/28/2010 - Exhibit 13 - 2009 Hull and Robertson article entitled "Bard Recovery Filter: Evaluation and Management of Vena Cava Limb Perforation, Fracture, and Migration"
1434			Kaufman Deposition, 10/28/2010 - Exhibit 14 - Complication of articles: Nicholson, et al. August 9, 2010 article entitled "Prevalence of Fracture and Fragment Embolization of Bard Retrievable Inferior Vena Cava Filters and Clinical Implications Including Cardiac Perforation and Tamponade"; Ray and Kaufman 1996 article entitled "Update: Complications of inferior vena cava filters"; and Saeed et al. article entitled "Right Ventricular Migration of a Recovery IVC Filter's Fractured Wire with Subsequent Pericardial Tamponade"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1435			Kaufman Deposition, 10/28/2010 - Exhibit 15 - Complication of articles: Kaufman et al. 2006 article entitled "Guidelines for the Use of Retrievable and Convertible Vena Cava Filters: Report from the Society of Interventional Radiology Multidisciplinary Consensus Conference"; Kumar et al. 2008 article entitled "Fractured Inferior Vena Cava Filter Strut Presenting as a Penetrating Foreign Body in the Right Ventricle: Report of a Case"; Kallikourdis et al. article entitled "Survival After Sequential Mechanical Complications of Acute Myocardial Infarction, Complicated with Heparin-Induced Thrombocytopenia and Multiple Organ Failure: Report of a Case"; and Kuo et al. 2007 article entitled "Emergency Retrieval of a G2 Filter after Complete Migration into the Right Ventricle"
1436			Kaufman Deposition, 10/28/2010 - Exhibit 16 - Kaufman's 2006 article entitled "Expected Outcomes and Complications of Filter", included at the Interventional Symposium on Endovascular Therapy from 1/16-1/20/2005
1437			Kaufman Deposition, 10/28/2010 - Exhibit 1A - Study Protocol (dated 8/15/1997)
1438			Kaufman Deposition, 10/28/2010 - Exhibit 2 - Binkert, et al. November 2009 article entitled "Technical Success and Safety of Retrieval of the G2 Filter in a Prospective, Multicenter Study"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1439			Kaufman Deposition, 10/28/2010 - Exhibit 3 - Research Agreement between John A. Kaufman, M.D. and NMT Medical, Inc., signed and dated 4/12/1999 by Dr. Kaufman for the Pivotal animal research project
1440			Kaufman Deposition, 10/28/2010 - Exhibit 4 - RNF PDT Meeting Notes from a 6/1/1999 meeting with the Product Development Team at NMT Medical on RNF.
1441			Kaufman Deposition, 10/28/2010 - Exhibit 5 - 11/5/2002 Meeting Minutes Memo from Rob Carr to Several Re. "Filter Meeting Minutes (11/05/02)"
1442			Kaufman Deposition, 10/28/2010 - Exhibit 6 - Document entitled "Honorarium Payments".
1443			Kaufman Deposition, 10/28/2010 - Exhibit 7 - 6/15/2004 E-mail exchange b/w Janet Hudnall and John Kaufman Re. "fracture"
1444			Kaufman Deposition, 10/28/2010 - Exhibit 8 - BPV Recovery Filter System - Regulatory Strategy Flowchart and proposed responses to FDA's 3/30/2005 request for additional information on the modified Recovery filter system
1445			Kaufman Deposition, 10/28/2010 - Exhibit 9 - Meeting minutes from Bard's FDA conference call on 8/25/2005
1446			Kaufman, 01/04/2017, Exhibit 589 - Plaintiffs' Notice of Videotaped Deposition of John Kaufman, M.D.
1447			Kaufman, 01/04/2017, Exhibit 590 - 11/7/2016 Letter from Nelson Mullins to Christopher Kirchmer, Esq. of Provost Umphrey Law Firm LLP regarding their "serious concerns" about the subpoenas directed to Dr. Kaufman and Dr. Lehmann
1448			Kaufman, 01/04/2017, Exhibit 591 - BPV PowerPoint Presentation entitled "Denali Vena Cava Filter"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1449			Kaufman, 01/04/2017, Exhibit 592 - Consulting Agreement between C.R. Bard and Dr. Kaufman, signed on 3/15/2002, and 4/1/2002 letter with enclosure of a \$10,000 check for continuing expenses for the Prospective Multicenter Evaluation of the Safety Profile of the Bard Recovery Vena Cava Filter
1450			Kaufman, 01/04/2017, Exhibit 593 - November 2003 Monthly Report on IVC Filters/Covered Stents, by Janet Hudnall, detailing the launch of the Recovery Filter
1451			Kaufman, 01/04/2017, Exhibit 594 - BPV Consulting Request Form for Dr. Kaufman's services for a Bariatric Surgeon Panel on 2/12/2005, for which he received an honorarium of \$5,000; includes Information Agreement for the Focus Group Discussion, signed by Dr. Kaufman on 2/11/2005
1452			Kaufman, 01/04/2017, Exhibit 595 - Written notes from the Recovery Filter/Clinical Panel Review with Dr. Kaufman, Dr. Anthony Venbrux, and H. Houstard, Esq. (sp?), detailing issues with thrombus/clots, migration resistance, and radial force
1453			Kaufman, 01/04/2017, Exhibit 596 - 6/3-6/4/2008 E-mail exchange b/w Jason Greer and Mark Kleiman Re. "KB analysis", including a detailed analysis of kickbacks in pharm and the device industry, with Greer's analysis of fair market value; includes a document from the University of Texas Medical School at Houston entitled "Protocol - Correlation of BMI vs. Vena Cava Size"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1454			Kaufman, 01/04/2017, Exhibit 597 - PowerPoint Presentation entitled "Recovery Filter" by Janet Hudnall, detailing market projections, the benefits of a removable filter incl. scientific evidence, the components of an ideal caval filter, and the features of the Recovery filter
1455			Kaufman, 01/04/2017, Exhibit 599 - Document entitled "G2 Customer Specific Approaches to Sharing the Everest Trials and Positioning the Upcoming G2 Express" from 2008 Intensive Filter Training Workshop in Chicago, which Andy Block sent to Mark Wilson (Sales) by e-mail on 3/7/2008 (Subject: "G2 Customer Specific Approaches") to summarize the group's recommendations for approaching the 4 types of G2 customers with the Everest Trial and eventually G2 Express. On 3/10/2008, Mark Wilson forwarded to several to be discussed at a session on 3/11 in Dallas.
1456			Kaufman, 01/04/2017, Exhibit 600 - 2006 article by Kaufman et al. entitled "Guidelines for the Use of Retrievable and Convertible Vena Cava Filters: Report from the Society of Interventional Radiology Multidisciplinary Consensus Conference"
1457			Kaufman, 01/04/2017, Exhibit 601 - 2007 article by Kaufman et al. entitled "Guidelines for the Use of Retrievable Vena Cava Filters"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1458			Kaufman, 01/04/2017, Exhibit 602 - Draft version of "A Prospective, Multicenter Evaluation of the Safety Profile of the Bard Recovery Filter" (BPT-0101), with handwritten edits; also includes 11/15/2001 e-mail from Carol Vierling, Re. "RF Protocol and CRFs", forwarding and discussing these changes; also a 12/13/2001 e-mail from Vierling with updated revisions and mention of the statistical section needing work; also includes Check Request and \$10,000 check for same, and e-mails concerning this payment
1459			Kaufman, 01/04/2017, Exhibit 604 - 8/18/2011 E-mail from Linda Hrevnack to Jim Beasley and John DeFord Re. "Need your opinion on the SIR Foundation Discovery Campaign Proposal", attaching Proposal and Requesting for Funding from SIR Foundation for the "Discovery Campaign" (requesting \$1 million payable over 5 years, "an extremely large ask for the Bard Foundation"); Hrevnack requested input on whether Bard should support this organization
1460			Kaufman, 01/04/2017, Exhibit 605 - Complaint Record Detail Report File for Complaint No. 41018/RF048F in the UK, Description: Penetration of IVC
1461			Kaufman, 01/04/2017, Exhibit 606 - Consulting Agreement between Bard Peripheral Vascular and Dr. Kaufman, signed on 3/29/2005, for the topic of "Recovery Filter Post-Market Registry Data Set Development"
1462			Kessler Deposition, 10/05/2016 - Exhibit 01 - Defendants' Third Amended Notice of Videotaped Deposition of David Kessler, M.D.

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1463			Kessler Deposition, 10/05/2016 - Exhibit 10 - Document with the acceptance criteria, test parameters, and results for RNF Corrosion/Fatigue Testing (R&D Technical Report issued 8/4/1999) and G2X Express Corrosion/Fatigue Testing (TR 07-12-01)
1464			Kessler Deposition, 10/05/2016 - Exhibit 11 - Design Input Summary Report for the TETRA G3 Vena Cava Filter, TD-00395 Rev. 0010, with handwritten notes
1465			Kessler Deposition, 10/05/2016 - Exhibit 12 - "Recovery IVC Filter U.S. Launch Update" by the BPV Management Board, dated 11/17/2003, with handwritten notes and highlighting on BPV-17-01-00000132, 134, and 137; also includes a 9/8/2006 E-mail from Mark Kumming to Rick Guest, Jack Sullivan, and Jason Greer Re. "MVA", reiterating that "we can not directly support training programs in which Physicians train other physicians on "off-label" uses of our products"
1466			Kessler Deposition, 10/05/2016 - Exhibit 13 - Kessler's copy of Exhibit 5, the 6/17/2016 E-mail from David Kessler to Thomas Gross of the FDA, with no subject, inquiring about whether a statistic analysis by a 510(k) device manufacturer is reportable as an MDR if they find that the device is associated with an increase in deaths due to device malfunctions compared to the predicate and other devices in its class, to which Gross replied on 6/18 that "device-related deaths are reportable" but "it would be more beneficial if the device manufacturer also appended their analysis with the MDR(s) "

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1467			Kessler Deposition, 10/05/2016 - Exhibit 15 - Pages 11-13 of the Simon Nitinol Filter System 522 Response: PS140002 - the 10/17/2014 FDA letter to Joni Creal of BPV Re. "Postmarket Surveillance (PS) Study: PS140002, Simon Nitinol Filter System Devices"
1468			Kessler Deposition, 10/05/2016 - Exhibit 16 - Handwritten Notes, followed by BPV's Clinical Evaluation Report on the Permanent Simon Nitinol Filter System, dated June 2014 Rev. 2 (CER0016), and a PowerPoint Presentation by Natalie Wong entitled "Filters Complaint History Data as of 7/31/2007"
1469			Kessler Deposition, 10/05/2016 - Exhibit 17 - PowerPoint slides from Penn IR detailing the 1998 PREPIC study; followed by a page of handwritten notes and a chart entitled "Summary of Efficacy Articles Related to IVC Filters" detailing the design, results, and conclusion of various studies with handwritten notes; followed by an extracted Table II entitled "Comparison of recommendations for IVCF between the 2008 and 2012 ACCP guidelines and the current ACR-SIR guidelines"
1470			Kessler Deposition, 10/05/2016 - Exhibit 18 - The "Conclusions" section (Pages 214-222) of the Expert Report of David A. Kessler, M.D., with handwritten numbering
1471			Kessler Deposition, 10/05/2016 - Exhibit 02 - Curriculum Vitae for David A. Kessler, M.D.

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1472			Kessler Deposition, 10/05/2016 - Exhibit 20 - Pages 26-28 of the NMT Technical File dated 7/17/1997, detailing the embolization, local migration, IVC wall penetration, and fracture of an IVC filter and the mechanisms or procedures to control these risks in the original Simon Nitinol filter and TRADEMARK filter
1473			Kessler Deposition, 10/05/2016 - Exhibit 21 - Compilation of documents: (1) Bard Draft Response for the 10/3/2002 Teleconference Discussion with FDA Reviewers Re. "FDA Questions to Bard Recovery Filter System Response Letter (K022236)", with handwritten notes; (2) 2010 Article by Beckman et al. entitled "Venous Thromboembolism - A Public Health Concern; (3) Pages 31-32 of the NMT Technical File dated 7/17/1997 detailing the complaint history of the Simon Nitinol filter, with highlights; (4) Agenda for the 6/4/1998 NMT/BRD Quarterly Meeting, with handwritten notes; and (5) NMT report entitled "CX-1571 Rework", dated 6/4/1998, detailing quality issues and corrective actions for the Simon Nitinol filter, with charts, graphs, and highlighting
1474			Kessler Deposition, 10/05/2016 - Exhibit 22 - Document entitled "Data & Statistics", detailing the data from the 2010 Beckman et al. article entitled "Venous Thromboembolism - A Public Health Concern"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1475			<p>Kessler Deposition, 10/05/2016 - Exhibit 23 - Compilation of articles and studies: (1) 2010 Article by Young T, Tang H, and Hughes R entitled "Vena cava filters for the prevention of pulmonary embolism (Review)", with handwritten notes; (2) Printout of the results generated from searches for "randomized clinical trial and vena cava filters" and "controlled clinical trials and vena cava filters" on PubMed website, printed 9/30/2016; (3) Penn IR PowerPoint slides on FDA clearance and conclusions from the PREPIC study; (4) 2016 Article by Sarosiek et al. entitled "Association Between Inferior Vena Cava Filter Insertion in Trauma Patients and In-Hospital and Overall Mortality"; (5) 2015 Article by Mismetti et al. entitled "Effect of a Retrievable Inferior Vena Cava Filter Plus Anticoagulation vs. Anticoagulation Alone on Risk of Recurrent Pulmonary Embolism - A Randomized Clinical Trial"; (6) 2016 Article by White et al. entitled "Outcomes After Vena Cava Filter Use in Noncancer Patients with Acute Venous Thromboembolism - A Population-Based Study"; (7) 5/3/2015 Article by Josh Farkas entitled "What is the evidence behind the IVC filter?"; and (8) 2005 Article by The PREPIC Study Group entitled "Eight-Year Follow-Up of Patients with Permanent Vena Cava Filters in the Prevention of Pulmonary Embolism - the PREPIC Randomized Study"</p>

1476

Kessler Deposition, 10/05/2016 - Exhibit 24 - Compilation of documents in a folder entitled "IFUs": (1) January 2012 IFU for the Cordis TrapEase Permanent Filter; (2) IFU for the Stainless Steel Greenfield Vena Cava Filter (BPV-17-01-00024345-51); (3) April 2002 IFU for the Recovery Filter System; (4) extracted pages of the Expert Report of David A. Kessler, M.D. re. Bard's timeline of IFUs published for the Recovery and G2; (5) Documents from the "Greenfield" folder (printout from the Boston Scientific Website on "Over-the-Wire Greenfield Vena Cava Filter" and a Nov. 2001 IFU for the Stainless Steel Greenfield Vena Cava Filter, BPV-17-01-00024339-51); (6) Documents from the "SNF" folder (Rev. 01 of the Sept. 2002 IFU for the Simon Nitinol Filter SNF/SL Filter Sets, BPVEFILTER-01-00211480-94); (7) Documents from the "Simon Nitinol Filter BPV" folder (Rev. 01 of the Sept. 2002 IFU for the Simon Nitinol Filter SNF/SL Filter Sets, BPV-17-01-00024273-76); (8) Documents from the "Recovery" folder (Dec. 2003 IFU for the Recovery Filter in English and other languages and Rev. 05 of the IFU, BPVE-01-00038857-73); (9) Documents from the "Recovery Cone" folder (July 2008 Rev. 1 IFU for the Recovery Cone, BPVEFILTER-01-00205112-119); (10) Documents from the "G2" folder (Oct. 2009 Rev. 2 of the G2 Filter System IFU); (11) Documents from the "Recovery G2" folder (Aug. 2006 Rev. 3 IFU for the Recovery G2, BPVE-01-01613291-3306); (12) Documents from the "G2X Jugular/Subclavian" folder (Oct. 2009 Rev. 5 IFU for the G2X Jugular/Suclavian, BPVE-01-00738603-14); (13) Documents from the "G2X Femoral" folder (March 2009 Rev. 0 IFU for the G2X Femoral, BPVEFILTER-01-00211456-67); (14) Documents from the

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			"Meridian" folder (Oct. 2010 Rev. 0 IFU for the Meridian, BPVE-01-02027626-37); (14) Documents from the "Eclipse Jugular" folder (Feb. 2010 Rev. 1 IFU for the Eclipse Jugular, BPVEFILTER-01-00211444-55); (15) Documents from the "Eclipse Femoral" folder (Feb. 2010 Rev. 1 IFU for the Eclipse Femoral, BPVEFILTER-01-00211432-43)
1477			Kessler Deposition, 10/05/2016 - Exhibit 26 - Handwritten notes on several pieces of scratch paper, on charts detailing the findings of BARD clinical trials/studies and third party studies, and on extracted PowerPoint pages with charts and graphs of SNF, Recovery, and G2 Complaints by FDA Device Code
1478			Kessler Deposition, 10/05/2016 - Exhibit 28 - Handwritten notes by Wendy Espitia noting location of the word "horizontal" in Complaint Files 74455, 113035, 116489, and 166634
1479			Withdrawn - Kessler Deposition, 10/05/2016 - Exhibit 29 - Charts, timelines, summaries -
1480			Kessler Deposition, 10/05/2016 - Exhibit 05 - 6/17/2016 E-mail from David Kessler to Thomas Gross of the FDA
1481			Kessler Report - Statistical analysis
1482			Kessler Report - 11/19/1998 RNF Design Animal Verification Study, In-Vivo Occlusion Migration Resistance Data Sheets for 92 lb. sheep; laboratory worksheet concerning animal #379 dated contained the following entries under the heading "Occlusion to 50 mm Hg" next to the line "Maximum Pressure Gradient": 15/58, 15/60, 16/70
1483			Kessler Report - Bard Project 8049 included a caudal migration resistance force test (i.e. push test) in 15mm, 21mm and 28mm cavas.

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1484			Kessler Report - Recovery Filter Migration Remedial Action Plan dated April 21, 2004
1485			Kessler Report - Asset Purchase Agreement Dated As Of October 19, 2001 Among C.R. Bard, Inc. and NMT Medical, Inc.
1486			Kessler Report - Characterization of the Recovery Filter (RF) - Migration Resistance"(TPR-04-02-02),"Recent field activities indicate that migration failures have been reported for the RF product. Therefore, further testing of this specific characteristic is warranted."
1487			Kessler Report - Clinical Justification/Rationale of the RNF
1488			Kessler Report - "Funding Request" for the Denali Next Gen Filter, Bard, following the Recovery filter, made "additional iterative changes with G2, G2 Express and G2 SpaceX design modifications. "
1489			Kessler Report - IMPRA Memo re Regulatory Standard Requirements and Status for RF Special 510(k), 09/19/2002
1490			Kessler Report - "On an ongoing basis, Marketing Manager(s) will collect "active", post-market feedback regarding product performance, configuration, suggestions, and other customer needs/desires via information channels for a product line."
1491			Kessler Report - "RNF Animal Experiment Notes" for an experiment conducted on 11/19/1998 at Beth Israel Hospital Animal Facility stated that one of its primary objectives was "to test migration resistance in the face of totally occlusive events."

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1492			Kessler Report - "Starguide.xls" which includes migration resistance testing for the Recovery Filter "manufactured using the current supplier;"
1493			Kessler Report - "Vena Cava Filter Complications - FAQs" included the following response to the question "What is the migration rate for Recovery?"
1494			Kessler Report - 11/1/2003 PPS070016 (Revision 0) engineering specification for migration resistance stated: "Filter must resist migration at 50mmHg when fully occluded in diameter up to 28mm."
1495			Kessler Report - 8/5/1999 NMT Medical R&D Technical Report; RD-RPT-100 regarding RNF Migration Study, Design Verification, migration testing that was submitted as part of Bard's 510(k), 8 out of 15 Recovery filters migrated in the 50 to 69 mmHg range tested in a 28mm tube.
1496			Kessler Report - A January 13, 2005 draft of Bard product performance specifications stated the following acceptance criteria for the G1A
1497			Kessler Report - Addendum to BPV Remedial Action Plan SPA 04-04-01, revised December 1, 2005, regarding Limb Fractures of Recovery Filter
1498			Kessler Report - As discussed infra, Bard conducted a clinical study called the EVEREST Clinical Study involving the G2 filter.
1499			Kessler Report - August 2005, FDA issued a conditional approval for the IDE application and requested among other issues imaging of study patients at 6 months to assess device migration and fracture.

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1500			Kessler Report - August 7, 2010, John Van Vleet emailed BPV President Jim Beasley, Marketing Director Bill Little, and V.P. of QA Gin Schulz
1501			Kessler Report - Bard (NMT) developed the Recovery Filter in an attempt to develop a permanent filter that had the option of retrieval.
1502			Kessler Report - Bard 2010 "Franchise Reviews: Filters" listed as a weakness: "Perception of BPV filters - Nitinol material, complications, MAUDE; Product iterations only minimally impactful"
1503			Kessler Report - Bard conducted test runs on the Simon Nitinol Filter and Percutaneous Steel Greenfield Filter
1504			Kessler Report - Bard made changes to the Recovery device in developing the Modified Recovery (G2). A Bard document titled "G1A Filter and Femoral Delivery System - Considerations for Development of Design Testing Requirements," under the heading "Summary of Design Changes,"
1505			Kessler Report - Bard meeting presentation where "The objective...[was] to analyze EVEREST and MAUDE data and provide justification for proposed changes to the G2 filter"
1506			Kessler Report - Bard provides a table and notes that the dimension of the Recovery filter was 31mm compared to the SNF which was 38mm
1507			Kessler Report - Bard's "G3 Development History and Brainstorming" presentation, dated December 6, 2007, included the Caudal Migration Push Test Figure.

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1508			Kessler Report - Bard's 2005 G2 Filter System "US Sales Training Manual" stated that Bard "decided to bring the G2 filter to the market because it is simply the best technology we have to offer. We wanted to give our users and their patients the best possible product we have, as soon as possible."
1509			Kessler Report - Bard's complaint rates for migration shows that the Modified Recovery (G2) and Recovery Filter exceeded the DFMEA (Design Failure Mode and Effect Analysis) threshold. Bard changed the "failure mode typing by severity." According to Bard, "with failure mode typing by severity, occurrence ranking are in line with complaint rates
1510			Kessler Report - Bard's Fact Book which includes the design history file for the Recovery Filter device
1511			Kessler Report - Bard's February 19, 1999 presentation titled "Removable Nitinol Filter" included a slide discussing the "Elastic Hook Concept," which stated, "Arms designed for centering and caudal migration resistance".
1512			Kessler Report - Bard's February 28, 2007 presentation titled "G3 Filter Concept Selection"
1513			Kessler Report - Bard's initial IFUs for the Recovery, issued 4/02, 12/02 and 12/03, included no warning about filter fracture.
1514			Kessler Report - Bard's R&D Standard Operating Procedure RD-SOP-050.00 stated, "[i]f possible, the pressure gradient across the filter will be artificially raised to 50 mm Hg. The filter's migration resistance at 50 mm Hg across the filter will be assessed."
1515			Kessler Report - Bard's R002 policy defined an "unacceptable" risk

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1516			Kessler Report - Bard's Recovery Filter 510(k) application listed SNF and the Greenfield Filters as predicate devices.
1517			Kessler Report - Based on the Fishbone analysis insufficient caudal anchoring is likely the root cause of caudal tilts and caudal migrations, and indirectly of penetrations and fractures."
1518			Kessler Report - Between April and December 2004 there were seven (7) additional migration deaths associated with the Recovery filter (April 13, 2004, May 8, 2004; May 30, 2004; July 24, 2004; August 16, 2004; November 15, 2004; November 28, 2004)
1519			Kessler Report - Both Bard and NMT did migration resistance tests before Bard submitted the Recovery Filter 510(k) that showed that a significant percentage of the tested Recovery Filters could not resist pressures in the 50's or below, or in the 60's mmHg at 28mm diameter testing. For example, in testing done at 28mm IVC diameter on 6/19-20/2001, half of the tested samples migrated in these ranges.
1520			Kessler Report - Covariate analyses
1521			Kessler Report - December 9, 2004 Revised Remedial Action Plan described the Identification of the Problem
1522			Kessler Report - Dr. Lehmann's email contained an attachment titled "JWL Recovery MAUDE Assessement.xls". 4/23/2004 E-mail and AER Comparison Chart

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1523			Kessler Report - Email dated July 26, 2004 from John McDermott, President of BPV, to Len DeCant, VP of Research & Development, stated, "Len - as part of the filter development programs, please make sure we are doing some kind of testing to determine the distensibility of cavas."
1524			Kessler Report - Email from July 18, 2005, Janet Hudnall stated, "I handed out copies of the lists of accounts that were identified last Spring as 'special needs' accounts that could benefit from being included on the Roadshow...." Attached to this email was a document titled "Western Region: G1A Recovery 'Discussion' Customer's - PRIORITY ACCOUNTS."
1525			Kessler Report - email from Thomas P. Gross, Director, Office of Surveillance and Biometrics, Center for Devices and Radiological Health, Food and Drug Administration, June 18, 2016
1526			Kessler Report - EVEREST trial, that "Caudal migration in 2/3 Retrievals in clinical study".
1527			Kessler Report - FDA requested that Bard submit the proposed Dear Doctor Letter and revise labeling as a supplement to Bard's its 510(K) Application.
1528			Kessler Report - FDA510(k) Premarket Notification Database (visited 9/7/2016), http://www.accessdata.fda.gov .
1529			Kessler Report - February 13, 2004, Mary Edwards, Bard's Vice President of Regulatory/Clinical Affairs, circulated to others within the company "the final copy of the proposed email communication to the sales force regarding reports of migrations"
1530			Kessler Report - Fracture Threshold Slide - (risk level) in DFMEA.

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1531			Kessler Report - In RD-SOP-035.02 "RNF Migration Study," for the acceptance criteria where the "RNF filter must resist of 50mmHg pressure across the filter when fully occluded for 15 mm and 28 mm vessel diameters"
1532			Kessler Report - January 20, 2005 email from Christopher Ganer noted that "[d]ue to the inherent variability of the migration resistance test method,...[t]he acceptance criteria for migration testing will be based upon comparative stats (e.g., T-test). "
1533			Kessler Report - July 1, 2003, FDA requested additional information concerning Bard's clinical series performed by Dr. Murray Asch
1534			Kessler Report - July 10, 2002, Bard submitted a special 510(K) application (K022236) for changes to the Simon Nitinol Filter System for a device that would be known as the Recovery Filter (RNF).
1535			Kessler Report - July 16, 2005 email to several Bard employees, District Sales Manager Jason Greer suggested some selling points: "[M]ay I suggest the safest filter on the market that has been on the market for the longest time in its current form...the Simon Nitinol?" "If you want a filter that will give you the greatest chance of reducing your complications, The Simon Nitinol is that filter. (I have a spreadsheet from Maude that shows this)."
1536			Kessler Report - July 18, 2006 presentation from a Quality Management Board Review meeting included the following slide, which discussed G2 Filter Investigations (FIR-06-01-01) and specifically, caudal migration. One of the outcomes of the FIR was "G2 Filter will be optimized to address caudal migration, project number 8049."

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1537			Kessler Report - July 25, 2003, Bard received clearance to add instruction for percutaneous removal of the Recovery Filter
1538			Kessler Report - July 8, 2005, Bard submitted an Investigational Device Exemption Application (IDE) for the clinical study (G050134).
1539			Kessler Report - July 9, 2004, Bard had just two reports of fractures/detachments out of 67,800 SNF filters sold globally since 2000, versus 17 reports of fractures out of 10,200 Recovery filters implanted.
1540			Kessler Report - June 12, 2007, Bard's Mike Randall wrote to Arun Agrawal at CC Technologies, with the subject "SNF Filter Test stoppage," and stated, "Can you please not test the SNF sample I supplied you!! Please call me to discuss."
1541			Kessler Report - June 3, 2005, Bard sent an email with a draft clinical protocol for the clinical study named "EVEREST" to study the retrievability access of the filter.
1542			Kessler Report - June 3, 2005, Bard submitted a Traditional 510(k) for the Modified Recovery Filter (G2) to FDA
1543			Kessler Report - Clinical trial data for migration prior to marketing the Recovery filter, according to Bard's R002 policy that filter posed an "unacceptable" risk. Using post marketing adverse events data for migration, as of June 2004 the Recovery filter posed an "undesirable" risk.
1544			Kessler Report - March 2, 2005, Bard submitted a 510(k) application for a Modified Recovery device.

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1545			Kessler Report - March 24, 2005 meeting between Bard and the FDA, Dr. Ronald Robinson, from FDA's Division of Solid and Fluid Mechanics, in a discussion about migration resistance testing, stated, "Literature states about 70 mmHg is generated in completely occluded cava..."
1546			Kessler Report - May 11, 2005, John McDermott, BPV President, and David Ciavarella, C.R. Bard Staff Vice President of Corporate Clinical Affairs, sent a second "Dear Doctor" letter with the stated purpose of updating physicians on Bard's "internal analysis of reported adverse events related to the Recovery Filter", which included a statement that "Movement or migration is a known complication of vena cava filters."
1547			Kessler Report - Meeting Summary of a June 1, 2006 Filter Expert Panel meeting, held at the Hilton O'Hare in Chicago, Illinois
1548			Kessler Report - Migration of the SNF filter device was seen in two of 258 (0.8%) during the clinical trial for the SNF concerning patients who received SNF filters between February 1988 and November 1990
1549			Kessler Report - Minutes from a January 28, 2005 G1A Recovery Filter Femoral System Design and Development Design Review

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1550			Kessler Report - Minutes from an April 30, 1998 meeting of NMT's Product Development Team regarding the Recovery Filter noted that "Sherrie [Coval-Goldsmith, head of Regulatory Affairs] raised the issue of whether we are testing SNF in migration (in-vitro and/or in-vivo). It may be nice to show in our regulatory submissions a performance comparison between the established product (SNF) and the new product (RNF)."
1551			Kessler Report - NMT compared both the SNF and RNF filters against a 50 mmHg migration resistance standard. The acceptance criteria in those tests were whether each filter met the 50 mmHg standard, not whether the RNF filter was as migration resistant as the SNF. NMT carried devices. In those migrations resistance tests, 14/15 runs of RNFs migrated compared to 1/3 runs of SNFs migrated. The results were tabulated in the following graph
1552			Kessler Report - NMT document indicates that the SNF leg-span specification was 36 mm \pm 4mm.
1553			Kessler Report - NMT presentation to FDA on February 9, 2000, one slide titled "Migration Resistance"
1554			Kessler Report - Notes for another animal, #558, in the same experiment revealed above pressures of 19 mmHg through jugular sheath and approximately 49 mmHg below the filter.
1555			Kessler Report - November 1, 1999, Nitinol Medical Technologies submitted a 510(k) application for a modified Simon Nitinol filter and delivery system known as the Recovery Filter System.

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1556			Kessler Report - November 16, 2009, Gin Schulz emailed two documents to Gary Dolch. One of the documents was title "Nicholson talking points," which stated, "Other Data Points from Dr. Nicholson - a Recovery Filter and the remaining 49 had a G2 filter.
1557			Kessler Report - November 27, 2002, FDA clearance letter for RNF permanent use
1558			Kessler Report - November 7, 2005, Brian Hudson emailed Shari Allen (Regulatory), Len DeCant (R&D), et al., with the subject line "G2 Perforations," and reported, "I ran a quick comparison of the 'Perforation' rates between G2 and Recovery. It looks as if there is not a significant shift"
1559			Kessler Report - October 14, 2005, Bard and FDA had a teleconference to discuss the special 510(k) application for jugular or subclavian approaches during which FDA raised questions.
1560			Kessler Report - October 2007, Bard submitted G2, Greenfield, Cook Gunther Tulip, and Cordis Optease filters for corrosion testing to CC Technologies, Inc. The objective of the testing was to evaluate the corrosion susceptibility of the filters using the cyclic potentiodynamic polarization (CPP) test technique per ASTM F2129-06.
1561			Kessler Report - October 3, 2002, Bard and FDA had a teleconference
1562			Kessler Report - October 3, 2005, Bard submitted an IDE supplement to address FDA's questions about its clinical study.
1563			Kessler Report - Product performance standard for the Recovery Filter at 50 mmHg using the 35 mmHg number plus a safety factor of 15 mmHg.

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1564			Kessler Report - Push testing was the "most accurate and consistent test method and was best able to evaluate filter caudal migration resistance, while at the same time providing quantitative data."
1565			Kessler Report - Recovery Product Performance Specification, Bard stated: "Filter must resist migration at 50 mmHg when occluded in diameters of up to 28mm"
1566			Kessler Report - September 19, 2005, Bard submitted a 510(k) application to permit the use of the G2 filter (K052578) for jugular/subclavian approaches.
1567			Kessler Report - September 19, 2006 Bard internal memorandum from Inbal Lapid to "G3 Caudal Team, Project #8049," with the subject line "G3 Caudal Project Meeting Minutes"
1568		9-24-18	Kessler Report - September 30, 2010 memo from Brett Baird to Eclipse DRT, with the subject line "Eclipse Post-Market Design Review/Marketing Summary," stated: "The objective of the Eclipse Filter project was to enhance the G2 X filter surface finish..."
1569			Kessler Report - SIR "Quality Improvement Guidelines," initially published in 2001 and republished in 2003, with Grassi as lead author (Grassi, et al., "Quality Improvement Guidelines for Percutaneous Permanent Inferior Vena Cava Filter Placement for the Prevention of Pulmonary Embolism" J Vasc Interv Radiol 2003; 14:S271-S275, hereinafter, the "SIR Guidelines").
1570			Kessler Report - SubAssembly DHR Review dated September 7, 2006 for a Recovery filter stated: "Leg span specification: 30mm - 34mm. Actual leg span measurement: 32mm-33mm."

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1571			Kessler Report - Modified Recovery (G2), G2X and G2 Express filters, the addition of "caudal anchors to improve the resistance to caudal migration in comparison to the Eclipse/G2X/G2 filters," and thus "decreasing the likelihood of penetration to occur," and "decreasing the likelihood of fracture to occur," and "to resist tilt," and "prevent crossing of arms and legs at the deployment."
1572			Kessler Report - Wong statistical analysis in December 2004 and January 2005.
1573			Kessler Report - "RNF Animal Experiment Notes" dated 11/19/1998 contained information on an experimental procedure done on animal #379. At time 16:20 the document stated: "the readings from both femoral and jugular are stable at approximately 15 mmHg."
1574			Kessler Report - 4/14/2000 RNF Design Review II Minutes
1575			Kessler Report - 4/27/2004 Recovery filter migration HHE
1576			Kessler Report - December 17, 2002, Bard requested a meeting with the FDA to discuss proposed changes to the Recovery Filter, including the ability to retrieve or remove the filter from patients when deemed appropriate by healthcare professionals
1577			Kessler Report - Draft response to one of FDA's questions has the following sentence crossed out: "The Recovery Filter appears to perform at least as well as the Simon Nitinol Filter for its intended application." handwritten comment with an arrow pointing to the crossed-out text says, "Susan NO - let FDA make own conclusion (we have so little clinical experience w/rf...)"

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1578		9-25-18	Kessler Report ETR-06-28-29, revision 0, project #8049, Caudal Migration Test Method Development and G2 Filter Resistance Test Report, 11/27/06
1579			Kessler Report January 14, 2003 Bard met with FDA to discuss proposed changes
1580			Kessler Report -July 12, 2004 email from Bard's VP of Regulatory Sciences Chris Ganser, to Tim Ring and John Weiland, attached "an executive summary of Recovery Filter adverse events (migration and fracture"
1581			Kessler Report -March 18, 2005 summary of the Traditional 510(k) application for the Recovery Filter also noted that the Modified Recovery (G2) passed the filter migration resistance test
1582			Kessler Report -May 11, 2005, John McDermott, BPV President, and David Ciavarella, C.R. Bard Staff Vice President of Corporate Clinical Affairs, sent a second "Dear Doctor" letter with the stated purpose of updating physicians on Bard's "internal analysis of reported adverse events related to the Recovery® Filter," which included a statement that "Movement or migration is a known complication of vena cava filters."
1583			Kessler Report -May 2, 2005 email from Brian Barry to John Weiland, Bard's CEO, and Chris Ganser, VP of Corp. QA, regarding "Competitive Filter Data"
1584			Kessler Report -May 31, 2007, email from Bard's Senior Engineer R&D, Mike Randall, to Arun Agrawal, Senior Project Manager at CC Technologies, Inc. stated: "Please take this email as written notice that I have sent you ten (10) SNF vena cava filters for corrosion testing per ASTM F21219-06."

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1585			Kessler Report - Presentation titled "G2 and G2 X Fracture Analysis, Draft 11/30/08"
1586			Kinney Kalva Roberts Expert Report - 04/07/2000, NMT R&D Technical Report, RD-RPT-122, Migration Study of 30-31mm leg span RNF in 28mm IVC
1587			Kinney Kalva Roberts Expert Report - 08/05/1999, NMT R&D Technical Report, RD-RPT-100, RNF Migration Study, Design Verification
1588			Kinney Kalva Roberts Expert Report - 09/01/2000 R&D Technical Report - RNF Diagram, Kessler Schedule 4
1589			Kinney Kalva Roberts Expert Report - 6/9/2000, NMT R&D Technical Report, RD-RPT-100, RNF Fatigue Evaluation of RNF and 2/2000 draft with Carol Ryan's comments
1590			Kinney Kalva Roberts Expert Report - G1A Product Performance Specifications, 2/10/05 -2/11/05 (PPS070028)
1591			Kinney Kalva Roberts Expert Report - Meridian DHF, Project #8120, Binder 3 of 5, DV&V Test Protocol/Report Approval
1592			Kinney Kalva Roberts Expert Report - R&D Technical Report, 04/07/2000, RD-RPT-122, Migration Study of 30-31mm leg span RNF in 28mm IVC, draft
1593			Kinney Kalva Roberts Expert Report - 6/28/2011 email from Nicole Ibrahim to Joni Creal re "Meridian June 22 2011 Meeting Minutes"
1594			Lehmann Deposition, 04/02/2013 - Exhibit 08 - 2/16/2005 E-mail from Charlie Simpson to Hudnall Re. "American Venous Forum - Mary Protocor presented an evaluation of filter related findings from the Maude database"

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1595			Lehmann Deposition, 04/02/2013 - Exhibit 09 - 3/2/2004 E-mail from Kellee Jones to many Re. "Agenda for the Recovery Filter Migration Meeting on March 4, 2004 in Tempe, Arizona"
1596			Lehmann Deposition, 04/02/2013, Exhibit 01 - Request for Production
1597			Lehmann Deposition, 04/02/2013, Exhibit 02 - Curriculum Vitae of John W. Lehmann, M.D., M.P.H., consultant on medical device development and approvals since 1995; revised May 2003 (at the time he was working for Bard)
1598			Lehmann Deposition, 04/02/2013, Exhibit 03 - Updated Curriculum Vitae of John W. Lehmann, M.D., M.P.H., including patents, bibliography, and recent presentations/panels; revised March 2013
1599			Lehmann Deposition, 04/02/2013, Exhibit 05 - 2/12/2004 "High" importance E-mail exchange b/w Hudnall and Mary Edwards, "FW: Maude", attaching the supporting documentation for the Recovery Sales Force communique
1600			Lehmann Deposition, 04/02/2013, Exhibit 06 - Recovery Filter Stock Transition Plan by Janet Hudnall, dated 3/4/2005
1601			Lehmann Deposition, 04/02/2013, Exhibit 07 - 2/23/2004 Memo from Doug Uelmen to Distribution Re. "Filter Migration Meeting Minutes of February 20, 2004 & New Information as of February 23, 2004"
1602			Lehmann Deposition, 04/02/2013, Exhibit 10 - 3/9/2004 E-mail from Kellee Jones to many Re. "3/4/2004 RF Migration Meeting Minutes"
1603			Lehmann Deposition, 04/02/2013, Exhibit 11 - 3/8/2004 E-mail from Kellee Jones to many Re. "3/4/2004 RF Migration Meeting: Fault Tree Analysis"

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1604			Lehmann Deposition, 04/02/2013, Exhibit 12 - 3/12-3/19/2004 E-mail Exchange b/w Lehmann and Holly Glass Re. "Recovery Crisis Communications Plan"
1605			Lehmann Deposition, 04/02/2013, Exhibit 13 - 4/23/2004 E-mail to Weiland and others from Carr re MAUDE 2004, with attached filter sales comparative competitor chart
1606			Lehmann Deposition, 04/02/2013, Exhibit 15 - Failure Investigation Report for Recovery Filter Migration, FIR-04-12-02 Rev. 00
1607			Lehmann Deposition, 08/07/2014 - Exhibit 01 - Plaintiff Jennifer Coker's Notice of Deposition of John Lehmann, M.D., M.P.H.
1608			Lehmann Deposition, 08/07/2014 - Exhibit 02 - Updated Curriculum Vitae of John W. Lehmann, M.D., M.P.H., including patents, bibliography, and recent presentations/panels; revised March 2013
1609			Lehmann Deposition, 08/07/2014 - Exhibit 05 - Health Hazard Evaluation Memo from Ciavarella to Uelmen Re. "Recovery Filter - Consultant's report", dated 12/17/2004
1610			Lehmann Deposition, 08/07/2014 - Exhibit 06 - Health Hazard Evaluation Memo from Ciavarella to Uelmen Re. "Recovery Filter - Consultant's report", dated 12/13/2004
1611			Lehmann Deposition, 08/07/2014, Exhibit 04 - Information for Use - Recovery Filter System, Labeling Issue Date: December 2003
1612			Lehmann Deposition, 08/07/2014, Exhibit 08 - Updated Health Hazard Evaluation Memo from Ciavarella to Uelmen, Re: "Limb Fractures of Recovery Filter", dated 7/9/2004

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1613			Lehmann Deposition, 08/07/2014, Exhibit 09 - 6/10/2004 E-mail exchange b/w Ciavarella and Cindi Walcott Re. "Recovery Filter/Detachments"
1614			Lehmann Deposition, 08/07/2014, Exhibit 12 - 2/12/2004 "High" importance E-mail exchange b/w Hudnall and Mary Edwards, "FW: Maude"
1615			Little Deposition, 06/27/2016 - Exhibit 2000 - Undated Letter from Stacy Taiber, Iowa Territory Manager for BPV, to Brent Adamson, M.D. in NE
1616		9-25-18	Little Deposition, 06/27/2016 - Exhibit 2003 - "Patient Questions & Answers" Brochure for the G2 Filter System
1617			Little Deposition, 06/27/2016 - Exhibit 2004 - Chart entitled "EVEREST/Cook Celect Clinical Comparison"
1618			Little Deposition, 06/27/2016 - Exhibit 2005 - 4/27/2010 BPV Memo from Filter Marketing to Bill Little Re. "Filter naming", detailing the name rational for the Eclipse and Denali
1619			Little Deposition, 06/27/2016 - Exhibit 2007 - Article by William J. Nicholson, M.D. entitled "Correction to Article about Prevalence of Fracture and Fragment Embolization of Bard Retrievable Vena Cava Filters", detailing errors found in the original article, as a log of patients who received the Bard G2 Filter at York Hospital from 2007-2009 was not made available to investigators and they were not included in the study

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1620			Little Deposition, 06/27/2016 - Exhibit 2008 - 11/13/2009 E-mail from Gin Schulz to Jim Beasley Re. "Brief", forwarding and detailing Dr. Nicholson's 11/4 "WHC Cath Conference Webex Presentation" on the RNF/G2 fracture experience; forwarded to others who discussed needing to put together an action plan to send out Compliance, as the press was not involved yet
1621		9-25-18	Little Deposition, 06/27/2016 - Exhibit 2009 - "Fractures of a Nitinol IVC Filter" presentation by Dr. W. Jay Nicholson on www.CRToonline.org , in which he reviewed a single center experience on fractures with the Bard Recovery and G2 filters
1622			Little Deposition, 06/27/2016 - Exhibit 2011 - Instructions for Use for the G2X Vena Cava Filter Jugular/Subclavian Vein Approach
1623			Little Deposition, 06/27/2016 - Exhibit 2012 - 2009 Article by Binkert et al. entitled "Technical Success and Safety of Retrieval of the G2 Filter in a Prospective, Multicenter Study", which involved caudal migrations in 12% of cases, tilt in 18%, leg penetration in 26%, and recurrent PE in 2%, but concluded that retrieval of the Recovery G2 was safe and successful in most patients (95%)
1624			Lynch, 01/30/2017, Exhibit 775 - Notice of Deposition
1625			Lynch, 01/30/2017, Exhibit 776 - VIP Corporate Visit Profile
1626			Lynch, 01/30/2017, Exhibit 779 - E-mail Thread 10/24/08 Subject,
1627			Lynch, 01/30/2017, Exhibit 780 - Memorandum 10/23/08 Subject, Vena Cava Research Outline

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1628			Lynch, 01/30/2017, Exhibit 781 - G3 Filter Field/Visit Clinical Interviews Log
1629			Lynch, 01/30/2017, Exhibit 782 - E-mail Thread 2/3/09 Subject, Hershey
1630			Lynch, 01/30/2017, Exhibit 783 - Bard Internal Document of AEs Reported by Lynch
1631			Lynch, 01/30/2017, Exhibit 784 - E-mail Thread 3/10/09 Subject, Dr. Lynch
1632			Lynch, 01/30/2017, Exhibit 785 - E-mail Thread 9/17/09 Subject, October 5-And Nov. 2 Animal Study
1633			Lynch, 01/30/2017, Exhibit 786 - E-mail Thread 5/26/12 Subject, Clinical Study 2
1634			Lynch, 01/30/2017, Exhibit 787 - E-mail Thread 11/4/15 Subject, Long-Term Safety
1635			Lynch, 01/30/2017, Exhibit 788 - Important Information About your IVC Filter Removemyfilter.com
1636			Lynch, 01/30/2017, Exhibit 789 - Remove Your IVC Filter Removemyfilter.com
1637			Lynch, 01/30/2017, Exhibit 790 - Bard Marketing Document Control Policy
1638			Lynch, 01/30/2017, Exhibit 791 - E-mail Thread 3/8/05 Subject, Database
1639			Lynch, 01/30/2017, Exhibit 792 - Regulatory Affairs Manual
1640			Lynch, 01/30/2017, Exhibit 793 - ACR-SIR-SPR Practice Parameter for the Performance of Inferior Vena Cava IVC Filter Placement for the Prevention of Pulmonary Embolism
1641			Lynch, 01/30/2017, Exhibit 794 - Curriculum Vitae Of Dr. Lynch (Placeholder until Received)
1642			McDermott Deposition, 02/05/2014 - Exhibit 01 - Plaintiff Mary Giordano's Deposition Subpoena for Personal Appearance and Production of Documents to John McDermott

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1643		9-24-18	McDermott Deposition, 02/05/2014 - Exhibit 02 - Bard's Product Performance Specification Report on the Recovery Filter and Femoral Delivery System, PPS No. PPS070016 Rev. 0
1644			McDermott Deposition, 02/05/2014 - Exhibit 07 - 6/23/2008 E-mail from Mike Randall
1645			McDermott Deposition, 11/01/2010 - Exhibit 01 - 5/9/2005 Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - April 2005", global sales and marketing in surgical and interventional; page 1 (see Exhibit 10 for full Memo)
1646			McDermott Deposition, 11/01/2010 - Exhibit 02 - 2/17/2006 Memo from Mickey Graves and Natalie Wong to Several Re. "Recovery Filter (Generation 1) Product Assessment Team Minutes - Fracture"
1647			McDermott Deposition, 11/01/2010 - Exhibit 03 - 8/3/2005 E-mail exchange b/w Wedlock and McDermott re. Australian Death, Complaint No. AUS05183.
1648			McDermott Deposition, 11/01/2010 - Exhibit 04 - 12/14/2004 E-mail exchange b/w McDermott and Hudnall, entitled "Optional Filter Clinical Data Comparison"
1649			McDermott Deposition, 11/01/2010 - Exhibit 05 - 5/11/2005 "Dear Colleague" letter from BPV re. the Recovery filter system
1650			McDermott Deposition, 11/01/2010 - Exhibit 06 - 10/5/2005 Letter from Sheila M. Stieritz, BSN (Director of the Patient Safety Dept. at Abington Memorial Hospital) to John McDermott and Dr. David Ciavarella Re. "Bard Recovery Filter Problems"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1651			McDermott Deposition, 11/01/2010 - Exhibit 07 - 10/11/2005 E-mail from Janet Hudnall about her meeting with Abington Memorial to address concerns
1652			Withdrawn - McDermott Deposition, 11/01/2010 - Exhibit 09 - E-mail from Len DeCant to McDermott
1653			McDermott Deposition, 11/01/2010 - Exhibit 11 - Important Information for Use Update - Dear Doctor letter draft
1654			McDermott Deposition, 11/01/2010 - Exhibit 12 - 5/17/2004 E-mail from Janet Hudnall to Dr. Alex Powell Re. "Thank You"
1655			McDermott Deposition, 11/01/2010 - Exhibit 13 - 5/17/2004 E-mail from Uelmen Re. "Filter Migration"
1656			McDermott Deposition, 11/01/2010 - Exhibit 14 - 8/14/2005 "E-mail from Mike Wedlock to David Ciavarella
1657			McDermott Deposition, 11/01/2010 - Exhibit 15 - Recovery Filter Migration Remedial Action Plan (SPA-04-12-01): Addendum II, marked privileged and confidential, faxed by Kellee Jones to Chris Ganer on 9/22/2005 with changes made by "Pete & Corp. Legal".
1658			McDermott Deposition, 11/01/2010 - Exhibit 16 - 5/28/2004 E-mail from Ciavarella to Brian Barry, Christopher Ganer, and John Weiland Re. "Recovery filter discussion with Dr. Misra"
1659			McDermott Deposition, 11/01/2010 - Exhibit 17 - 9/26/2006 E-mail from Jason Greer to Seth Joyner
1660			McDermott Deposition, 11/01/2010 - Exhibit 18 - 8/15/2002 E-mail from John McDermott to Mary Minske
1661			McDermott Deposition, 11/01/2010 - Exhibit 19 - BPV's Timeline Chart entitled "Product Evolution - Chronology"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1662			McDonald Deposition, 07/29/2016 - Exhibit 01 - 3/6/2009 E-mail from Brian Doherty to TPE-PV Sales-DG Re. "Designed to Win Contest Through 3/5/2009"
1663			McDonald Deposition, 07/29/2016 - Exhibit 02 - 9/20/2012 E-mail from Hans Yentz to TPE-Vascular Sales Re. "YTD Meridian Game Changer Rankings"
1664			McDonald Deposition, 07/29/2016 - Exhibit 03 - Printout from Bard website entitled "Guiding Principles", detailing Bard's four Core Values
1665			McDonald Deposition, 07/29/2016 - Exhibit 06 - Complaint Record Detail Report 96258
1666			McDonald Deposition, 07/29/2016 - Exhibit 07 - Complaint Record Detail Report 116416
1667			McDonald Deposition, 07/29/2016 - Exhibit 08 - Complaint Record Detail Report 139053
1668			McDonald Deposition, 07/29/2016 - Exhibit 09 - Complaint Record Detail Report 147014
1669			McDonald Deposition, 07/29/2016 - Exhibit 10 - Complaint Record Detail Report 158687
1670			McDonald Deposition, 07/29/2016 - Exhibit 11 - Complaint Record Detail Report 204256
1671			McDonald Deposition, 07/29/2016 - Exhibit 12 - Complaint Record Detail Report 204256
1672			McDonald Deposition, 07/29/2016 - Exhibit 13 - Complaint Record Detail Report 221991
1673			McDonald Deposition, 07/29/2016 - Exhibit 14 - Complaint Record Detail Report 227395
1674			McDonald Deposition, 07/29/2016 - Exhibit 15 - Complaint Record Detail Report 237752

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1675			McDonald Deposition, 07/29/2016 - Exhibit 16 - Complaint Record Detail Report 264777
1676			McDonald Deposition, 07/29/2016 - Exhibit 17 - Complaint Record Detail Report 260834
1677			McDonald Deposition, 07/29/2016 - Exhibit 18 - Complaint Record Detail Report 260834
1678			McDonald Deposition, 07/29/2016 - Exhibit 19 - Complaint Record Detail Report 254658
1679			McDonald Deposition, 07/29/2016 - Exhibit 20 - Complaint Record Detail Report 254663
1680		9-25-18	McDonald Deposition, 07/29/2016 - Exhibit 21 - 7/13/2015 Warning Letter from the FDA regarding the 11/25/2014 Inspection of the C.R. Bard facility in NY and the 11/18/2014-1/5/2015 Inspection of the BPV facility in AZ
1681			McMeeking Deposition, 07/19/2016 - Exhibit 01 - Defendant's Notice of Deposition for Dr. Robert McMeeking
1682			McMeeking Deposition, 07/19/2016 - Exhibit 02 - Plaintiff's Responses to Expert Interrogatories and Supplemental Answers to Dr. Muehrcke
1683			Exhibit Number Skipped
1684			Exhibit Number Skipped
1685			Exhibit Number Skipped
1686			Exhibit Number Skipped
1687			Exhibit Number Skipped
1688			Exhibit Number Skipped
1689			Exhibit Number Skipped
1690			Exhibit Number Skipped
1691			Exhibit Number Skipped
1692			Withdrawn - McMeeking Deposition, 07/19/2016 - Exhibit 17 - Revised Medical Timeline of Clare Austin
1693			McMeeking Deposition, 07/19/2016 - Exhibit 18 - Document entitled "True Strain Calculation"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1694			McMeeking Deposition, 07/19/2016 - Exhibit 19 - Results of Simulations of Filter Tilting
1695			McMeeking Deposition, 07/19/2016 - Exhibit 20 - Document entitled "Mechanical Reliability Assessment of the Bard G2 Filter"
1696			Exhibit Number Skipped
1697			McMeeking Deposition, 07/19/2016 - Exhibit 22 - Diagrams drawn by Robert McMeeking
1698			McMeeking Deposition, 07/19/2016 - Exhibit 23 - Drawings done by Robert McMeeking
1699			McMeeking Expert Report - Appendix 2. 510(k) Summary Eclipse Filter System
1700			McMeeking Expert Report - Clinical Evaluation Report CER0014 Rev. 1, Recoverable Vena Cava Filter Systems, Recovery Filter System, G2 X Filter System, Denali Filter System, August 2011
1701			McMeeking Expert Report - Device description pages from [26]
1702			Duplicate - See Ex 1701 -- McMeeking Expert Report - Device description pages from [28]
1703			McMeeking Expert Report - Eclipse - Femoral and Jugular/Subclavian Delivery Kits Special 510(k) Premarket Notification
1704			McMeeking Expert Report - Eclipse - Femoral and Jugular/Subclavian Delivery Kits Special 510(k) Premarket Submission November 23, 2009
1705			McMeeking Expert Report - Eclipse Filter System - Femoral and Jugular/Subclavian Delivery Kits, 510(k) Summary and Clearance
1706			McMeeking Expert Report - Eclipse Filter System - Femoral and Jugular/Subclavian Delivery Kits, Response to FDA Questions, 17th December, 2009

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1707			McMeeking Expert Report - Engineering drawing of the Bard G2 Express IVC Filter
1708			McMeeking Expert Report - Engineering drawing of the Bard G2 Express IVC Filter Cap
1709			McMeeking Expert Report - Engineering drawing of the Bard G2 IVC Filter, 12/8/2004 RNF R&D 40mm Filter
1710			McMeeking Expert Report - G2 Express Design History File
1711			McMeeking Expert Report - G2 Express Filter System - Femoral and Jugular/Subclavian Delivery Kits, Special 510(k) Submission, 12th August, 2008
1712			McMeeking Expert Report - G2 Express Filter System - Femoral and Jugular/Subclavian Delivery Kits, Special 510(k) Submission, 7th March, 2008
1713			McMeeking Expert Report - Rotary Beam Fatigue of Nitinol Wire, Anonymous memo to Design History File, unsigned, November 10, 2008
1714			McMeeking Expert Report - Summary data to Support ECLIPSE Special 510(k) Submission, 25th November 2009,
1715			McMeeking Expert Report - Vail (Eclipse) Design History and Transfer Documents (Including Sections of Corporate Quality Assurance Manual)
1716			McMeeking Expert Report -Eclipse Vena Cava Filter Performance Specifications, (PPS-8113), 1/12/10, Design History File Index
1717			Modra Deposition, 03/28/2013 - Exhibit 01 - Plaintiff Kevin Phillips' First Amended Notice of 30(b)(6) Deposition: Adverse Events/Post- Marketing Surveillance
1718			Modra Deposition, 03/28/2013 - Exhibit 02 - 7/27/2005 E-mail exchange b/w Brian Hudson and Lynne BuchananKopp

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1719			Modra Deposition, 03/28/2013 - Exhibit 03 - Complaint File No. 5104020023 opened on 2/9/2004 for U.S. case.
1720			Modra Deposition, 03/28/2013 - Exhibit 04 - 4/27/2004 E-mail from Cindi Walcott to Mandy Whitton, Brian Brown, and Stephanie Lyke Re. "Filter Migration"
1721			Modra Deposition, 03/28/2013 - Exhibit 05 - Complaint File No. 23459/RF048F opened on 10/4/2004 for U.S. case of asymptomatic perforation of the cava wall discovered prior to successful percutaneous retrieval of a Recovery filter
1722			Modra Deposition, 03/28/2013 - Exhibit 06 - Chart entitled "Recovery Filter (RF048F) - R002 Chronology of Events"
1723			Modra Deposition, 03/28/2013 - Exhibit 07 - Complaint File No. 15279/RF048F opened on 7/16/2004 for a U.S. case with routine removal of a Recovery filter from an asymptomatic patient, during which a filter leg was discovered to have fractured and embedded in the cava wall. Filter was removed, but 2/3 of the leg remains firmly embedded in the caval wall. Placed in a postpartum patient
1724			Modra Deposition, 03/28/2013 - Exhibit 10 - Complaint File No. 48498/RF048F opened on 6/10/2005 for U.S. case of filter placed after trauma and shown to be slightly tilted at the time of planned removal. Post removal cavagram showed one hook in the cava wall; other hook and arm could not be found. Physician "is very unhappy with Bard" - felt he was "not adequately informed about detachments".

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1725			Modra Deposition, 03/28/2013 - Exhibit 11 - Complaint File No. 182471/RF048F opened on 7/18/2008 for a U.S. case involving fracture of a Recovery filter. Patient had chest pains and it was discovered that three limbs had fractured, one now in her heart and one in each lung.
1726			Modra Deposition, 03/28/2013 - Exhibit 12 - Complaint File No. 10747/Unknown opened on 12/5/2006 for Canada case involving penetration of three arms or legs through the IVC and gonadal vein
1727			Modra Deposition, 03/28/2013 - Exhibit 13 - Complaint File No. 138390/RF310F opened on 8/22/2007 for a U.S. case in which a G2 Filter was placed in a trauma patient and removal was attempted four months later, at which time it was discovered that the device had migrated caudally, tilted, and one of the legs had fractured. Device was removed, but fractured leg remains in vena cava.
1728			Modra Deposition, 03/28/2013 - Exhibit 14 - 6/30/2009 E-mail from Bret Baird (Marketing Manager of IVC Filters) to Sales Team listserve (TPE-PV Sales-DG) Re. "Bard IVC filter letter to customers"
1729			Modra Deposition, 03/28/2013 - Exhibit 15 - 4/19/2005 Memo from C. Ganser to T. Ring/J. Weiland Re. IVC Recovery Filter Adverse Events (Migrations/Fractures) - Executive Summary
1730			Modra Deposition, 03/28/2013 - Exhibit 16 - Updated "Recovery Filter Adverse Events (Migrations/Fractures)", an adverse event summary of the Recovery filter for migrations and fractures through 10/4/2005

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1731			Modra Deposition, 03/28/2013 - Exhibit 17 - Weekly Internal Audit Observation Report, dated 6/15/2005, sorted by responsible person
1732			Modra Deposition, 03/28/2013 - Exhibit 8 - Complaint File No. 18468/RF048F opened on 8/13/2004 for U.S. case of migration of a Recovery filter just below the right atrium. Doctor speculates that the anesthesiology required during resection of a brain tumor a few days after implant may have contributed to the migration.
1733			Modra Deposition, 03/28/2013 - Exhibit 9 - Complaint File No. 45717/RF048F opened on 5/16/2005 for U.S. case of a Recovery filter placed prior to bariatric surgery migrating to an unconfirmed site. Heavy clot in filter, with saddle embolus noted. Patient died. Physician "believes that the filter did it's job [but] wants specific data to see if he should discontinue placing them in Bariatric patients".
1734			Modra Deposition, 06/06/2014 - Exhibit 1 - Plaintiff Denise Ocasio's First Amended Notice of Rule (30b)(60) Deposition Duces Tecum
1735			Modra Deposition, 06/06/2014 - Exhibit 11 - 11/10-11/14/2005 E-mail exchange b/w Ganser and Schulz, re: "G2 Perforations"
1736			Modra Deposition, 06/06/2014 - Exhibit 12 - BPV R&D November Monthly Report, with the Product Development Status & Launch Schedule for all programs, dated 11/30/2007
1737			Modra Deposition, 06/06/2014 - Exhibit 2 - Plaintiff Denise Ocasio's First Amended Notice of Rule (30b)(60) Deposition Duces Tecum

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1738			Modra Deposition, 06/06/2014 - Exhibit 3 - Defendants' Objections and Response to Plaintiff's First Amended Notice of Rule (30b)(60) Deposition Duces Tecum
1739			Modra Deposition, 06/06/2014 - Exhibit 4 - Hand-drawn timeline of G2, G2 Express, and G2X from 2008 to 2012, with a typed chart to be used at the Ocasio v. Bard deposition, with 16 questions pertaining to the G2, G2 Express, and G2X
1740			Modra Deposition, 06/06/2014 - Exhibit 5 - 1/18/2010 E-mail from Bret Baird (Marketing Manager of IVC Filters) to Sales Team listserve (TPE-PV Sales-DG) Re. "Important: Eclipse Vena Cava Filter Launch Details"
1741			Modra Deposition, 06/06/2014 - Exhibit 6 - 4/28/2010 E-mail from Bret Baird (Marketing Manager of IVC Filters) to Sales Team listserve (TPE-PV Sales-DG)
1742			Modra Deposition, 06/06/2014 - Exhibit 7 - Product Opportunity Appraisal for the G2 Platinum Concept, POA-8088 Rev. 1.0, Revised on 5/5/2009
1743			Modra Deposition, 12/15/2015 - Exhibit 101 - Plaintiffs' Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) and Related Requests for Production of Documents
1744			Modra Deposition, 12/15/2015 - Exhibit 103 - FDA Inspectional Observation Report Pertaining to Observation at BPV in Tempe from 11/18/2014 to 1/5/2015
1745			Modra Deposition, 12/15/2015 - Exhibit 104 - 1/26/2014 Letter from Steven Williamson, President of BPV, to Mr. Alonza Cruz of the FDA Re. "C.R. Bard, Inc. Initial Response to the January 5, 2015 Inspectional Observations (Form FDA-483)", attaching C.R. Bard's 483 Response to 3 FDA Observations

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1746			Modra Deposition, 12/15/2015 - Exhibit 106 - Completed "Complaint Handling and Medical Device Reporting Training for Field Assurance" exams taken by all Field Assurance employees, including a chart indicating that all employees received 100% and completed the Medical Device Reporting - Reportability Assessment Certification on 2/25/2015
1747			Modra Deposition, 12/15/2015 - Exhibit 108 - 2/26/2015 Letter from Steven Williamson, President of BPV, to Mr. Alonza Cruz of the FDA Re. "Second Update Response to the FDA-483 issued January 5, 2015"
1748			Modra Deposition, 12/15/2015 - Exhibit 109 - 8/3/2015 Letter from Steven Williamson, President of BPV, and Jason Gaede, VP of Plant Operations at C.R. Bard, to FDA Compliance Officer Dr. Raymond Brullo Re. "W/L #27-15, Warning Letter Issued to C.R. Bard Inc. Dated July 13, 2015" following the FDA's inspection of Glen Falls Operations from 10/6-11/25/2014 and the BPV facility in Tempe from 11/18/14-1/5/2015.
1749			Modra Deposition, 12/15/2015 - Exhibit 111 - FDA Inspectional Observation Report Pertaining to Inspection at C.R. Bard, Inc. in Queensbury, NY from 10/6/2014 to 11/25/2014
1750			Modra Deposition, 12/15/2015 - Exhibit 112 - Responses to and Actions to Address Items 1-8 in the FDA's Warning Letter/Inspectional Observation
1751			Modra, 01/20/2016 - Exhibit 173 - 9/15/2003 Memo from Mary Edwards to Project File Re. "Recovery Cone Regulatory Status"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1752			Modra, 01/20/2016 - Exhibit 174 - 3/6/1998 FDA Letter to Microvena Corporation re. Clearance for Amplatz Goose Neck Snare Kit/Catheter, K972511, Regulatory Class II, received 1/14/1998. Includes the 510(K) Summary page for the Premarket Notification of the product and the executed Indications for Use page
1753			Modra, 01/20/2016 - Exhibit 175 - 5/13/2002 FDA Letter to Medical Device Technologies, Inc. re. Clearance for En-Snare Endovascular Snare and Catheter, Regulatory Class II, received 5/16/2002. Includes the 510(K) Summary page for the Premarket Notification of the product and the executed Indications for Use page
1754			Modra, 01/20/2016 - Exhibit 176 - 10/31/2002 FDA Letter to Cook Incorporated re. Clearance for Gunther Tulip Filter and Retrieval Set, Regulatory Class II, received 8/6/2003. Includes the 510(K) Summary page for the Premarket Notification of the product and the executed Indications for Use page
1755			Modra, 01/20/2016 - Exhibit 177 - 3/22/2004 FDA Letter to Cordis Corporation re. Clearance for Cordis OptEase Filter and Retrievable Catheter, Regulatory Class II, received 12/30/2003. Includes the 510(K) Summary page for the Premarket Notification of the product and the executed Indications for Use page
1756			Modra, 01/20/2016 - Exhibit 178 - 10/30/2015 Note to File from John Van Vleet Re. Warning Letter Response - Question 1 & 2, Subject: "Device Classification Review Documentation

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1757			Modra, 01/20/2016 - Exhibit 180 - 2/28/2013 Letter from FDA to BPV Re. "Reference 510(k): K031328, K073090, K050558, K022236"
1758			Modra, 01/26/2017, Exhibit 762A - Chart with listed documents (SOPN0700120 Rev. 00 to Rev. 14) and the Effective Date of each
1759			Modra, 01/26/2017, Exhibit 764A - Bard's Corporate Quality Assurance Manual Re. "Product Remedial Actions", CQA-STD-R002 Rev. 15, dated 3/2/2012
1760			Modra, 01/26/2017, Exhibit 765A - Bard's Corporate Quality Assurance Manual Re. "Risk Analysis Technique - Design Failure Modes and Effects Analysis", CQA-STD-16 Rev. 01, dated 10/4/2010
1761			Modra, 01/26/2017, Exhibit 768A - Binder entitled "SOPN0700120 (Rev 00-14)" Failure Mode and Effects Analysis - Standard Operating Procedure
1762			Modra, 01/26/2017, Exhibit 770A - Binder entitled "DFMEAs (Eclipse, Meridian, Denali)"
1763		9-20-18	Modra, 01/26/2017, Exhibit 771A - Chart entitled "Design Failure Mode and Effects Analysis" on the Simon Nitinol Filter - SNF/SL Filter Sets (DFMEA070042 Rev. 1)
1764			Modra, 01/26/2017, Exhibit 772A - Product Audit of Bard Recovery Filter System, Glen Falls Operation, July 19-23, 2004; audit conducted and reported by Quality Systems Engineering, Inc. (appears to be a draft - not signed)

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1765			Modra, 01/26/2017, Exhibit 773A - PowerPoint Presentation entitled "August 2004 BPV Complaint Report", detailing the sales, complaints, MDRs of all BPV products from Sept. 2003 to August 2004. Includes charts of "Total Vena Cava Filter Complaint Incidences by Month" and specific to the Recovery and Simon Nitinol
1766			Modra, 01/26/2017, Exhibit 774A - 6/10/2009 Memo from Jon Conaway to Design History File, Project #8088 Re. "G2 Platinum Filter DFMEA Complaint Analysis", detailing the complaint analysis of the G2 Platinum from June 2005 to March 2009
1767			Exhibit Number Skipped
1768			Exhibit Number Skipped
1769			Exhibit Number Skipped
1770			Muehrcke Deposition, 07/21/2016 - Exhibit 01 - Defendant's Notice of Deposition of Ex. Muehrcke, M.D., Derek, 7/21/16 deposition
1771			Muehrcke Deposition, 07/21/2016 - Exhibit 10 - Article entitled "Online First: Prevalence of Fracture and Fragment Embolization of Bard Retrievable Vena Cava Filters and Clinical Implications Including Cardiac Perforation and Tamponade"
1772			Duplicate - See Ex 663 - Muehrcke Deposition, 07/21/2016 - Exhibit 11 - Article entitled "Systematic Review of the Use of Retrievable Inferior Vena Cava Filters"
1773			Exhibit Number Skipped
1774			Exhibit Number Skipped
1775			Muehrcke Deposition, 07/21/2016 - Exhibit 18 - Undated Letter from Stacy Taiber, Iowa Territory Manager for BPV, to Brent Adamson, M.D. in NE, introducing herself and the launch of the Bard Recovery Filter System; with highlights

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1776			Muehrcke Deposition, 07/21/2016 - Exhibit 19 - Document entitled "G2 Platinum", Ex. 19 Muehrcke, M.D., Derek, 7/21/16 deposition
1777			Withdrawn - Muehrcke Deposition, 07/21/2016 - Exhibit 02 - Plaintiff's Responses to Expert Interrogatories and Supplemental Answers to Dr. Muehrcke
1778			Muehrcke Deposition, 07/21/2016 - Exhibit 20 - Brochure - Recovery Vena Cava Filter, Timeless Performance
1779			Muehrcke Deposition, 07/21/2016 - Exhibit 03 - Bullet List, Ex. 3 Muehrcke, M.D., Derek, 7/21/16 deposition
1780			Muehrcke Deposition, 07/21/2016 - Exhibit 07 - Diagram, Ex.7 Muehrcke, M.D., Derek, 7/21/16 deposition
1781			Muehrcke Deposition, 07/21/2016 - Exhibit 08 - Article entitled "Initial Experience in Humans with a New Retrievable Inferior Vena Cava Filter"
1782			Duplicate - See Ex 3793 - Muehrcke Deposition, 07/21/2016 - Exhibit 09 - Article entitled "Complications Related to Inferior Vena Cava Filters: A Single-Center Experience"
1783			Mukherjee Deposition, 01/26/2011 - Exhibit 01 - 7/9/2004 Memo from John McDermott to Tim Ring and John Weiland Re. "Monthly Global PV Report - June 2004"
1784			Mukherjee Deposition, 01/26/2011 - Exhibit 06 - Nitinol Hook Sharpening, 9/2/03
1785			Orms Deposition, 08/16/2016 - Exhibit 1 - Chart entitled "Western Region: G1A Recovery "Discussion" Customer's - Priority Accounts"
1786			Orms Deposition, 08/16/2016 - Exhibit 11 - 4/20/2010 E-mail Thread from Melissa Bui Re. "Filter Weekly Complaint Data through 4/19/2010"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1787			Orms Deposition, 08/16/2016 - Exhibit 13 - 11/9/2010 E-mail Thread from Chris Smith Re. "Northside(S) Filter Business"
1788		9-24-18	Orms Deposition, 08/16/2016 - Exhibit 14 - 10/2/2010 E-mail Thread from Jeffrey Pellicio Re. "Meridian Commercialization Plan"
1789			Orms Deposition, 08/16/2016 - Exhibit 15 - 6/27/2012 E-mail Thread from Brian Doherty Re. "14 of 21 Sales"
1790			Orms Deposition, 08/16/2016 - Exhibit 17 - 4/8/2010 BPV Memo from Jim Beasley to Tim Ring Re. "Monthly Management Report"
1791			Orms Deposition, 08/16/2016 - Exhibit 3 - 3/9/2007 E-mail thread from Janet Hudnall Re. "Marketing Support"
1792			Orms Deposition, 08/16/2016 - Exhibit 5 - 6/12/2007 E-mail thread from Janet Hudnall Re. "G2 Filter Stocking Order"
1793			Orms Deposition, 08/16/2016 - Exhibit 6 - 6/21/2007 E-mail thread from Mark Kumming Re. "Deflecting the Celest"
1794			Orms Deposition, 08/16/2016 - Exhibit 8 - Complaint Record Detail Report, dated 2/19/2010
1795			Orms Deposition, 08/16/2016 - Exhibit 9 - Complaint Record Detail Report, dated 2/19/2010
1796			Palestrant Deposition, 08/26/2016 - Exhibit 1 - List of Materials Received, Ex. 1, Palestrant, M.D., Aubrey, 8/26/16 deposition
1797			Palestrant Deposition, 08/26/2016 - Exhibit 2 - Invoices from Aubrey Palestrant to Nelson Mullins
1798			Palestrant Deposition, 08/26/2016 - Exhibit 3 - File folder labeled 89, Ex. 3, Palestrant, M.D., Aubrey, 8/26/16 deposition

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1799			Palestrant Deposition, 08/26/2016 - Exhibit 4 - File folder labeled 136, Ex. 4, Palestrant, M.D., Aubrey, 8/26/16 deposition
1800			Palestrant Deposition, 08/26/2016 - Exhibit 5 -United States Patent Number 4,832,055
1801			Palestrant Deposition, 08/26/2016 - Exhibit 8 - Draft of PowerPoint Presentation entitled "G2 and G2X Fracture Analysis", dated 11/30/2008, summarizing total complaints from 7/2005-11/2008 with graphs
1802			Patel Deposition, 03/22/2017, Exhibit 01 - Patal's Curriculum vitae
1803			Patel Deposition, 03/22/2017, Exhibit A - Medical Chart
1804			Patel Deposition, 03/22/2017, Exhibit A1 - Medical Consultation dated 01/03/2012
1805			Patel Deposition, 03/22/2017, Exhibit A12 - Discharge summary
1806			Patel Deposition, 03/22/2017, Exhibit A13 - Office notes, Dr. Harvey re pleural effusion and pus in the jugular site 08/14/2014
1807			Patel Deposition, 03/22/2017, Exhibit A14 - Office notes, visit for chest pain 02/23/2015
1808			Patel Deposition, 03/22/2017, Exhibit A15 - CT scan report, chest pain Gwinnett Medical 02/22/2015
1809			Patel Deposition, 03/22/2017, Exhibit A16 - Office notes, chest pain on 8/8/16
1810			Patel Deposition, 03/22/2017, Exhibit A4 - Consultation note dated 7/23/14 authored by Dr. Heller
1811			Patel Deposition, 03/22/2017, Exhibit A5 - Hospital chart, art of chart dealing with procedure by Kang
1812			Patel Deposition, 03/22/2017, Exhibit A6 - TEE record dated 07/23/2014

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1813			Patel Deposition, 03/22/2017, Exhibit A7 - Informed consent forms Gwinnett Hospital for Open Heart Procedure
1814			Patel Deposition, 03/22/2017-Exhibit A3 - X-Ray report dated 07/03/2014-chest and abdomen
1815			Raji-Kubba Deposition, 07/18/2016 - Exhibit 299 - 2006 Article by Kalva et al. entitled "Recovery Vena Cava Filter: Experience in 96 Patients"
1816			Raji-Kubba Deposition, 07/18/2016 - Exhibit 300 - 2009 Article by Hull and Robertson entitled "Bard Recovery Filter: Evaluation and Management of Vena Cava Limb Perforation, Fracture, and Migration"
1817			Raji-Kubba Deposition, 07/18/2016 - Exhibit 301 - 5/14/2009 E-mail from Bill Edwards to Raji-Kubba and Mike Randall Re. "Tomorrow"
1818			Raji-Kubba Deposition, 07/18/2016 - Exhibit 302 - Aug. 2010 Article by Nicholson et al. entitled "Online First: Prevalence of Fracture and Fragment Embolization of Bard Retrievable Vena Cava Filters and Clinical Implications Including Cardiac Perforation and Tamponade"
1819			Raji-Kubba Deposition, 07/18/2016 - Exhibit 303 - 8/5/2009 E-mail from Natalie Wong Re. "Questions from Jim during project review"
1820			Raji-Kubba Deposition, 07/18/2016 - Exhibit 304 - Internal Presentation on the G2 Filter System for Permanent Use, detailing the design modifications, features/benefits, and comparison to the Recovery Filter
1821		9-25-18	Raji-Kubba Deposition, 07/18/2016 - Exhibit 305 - 11/12/2009 E-mail from Bret Baird to Bill Little, John Van Vleet, and Gin Schulz

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1822			Raji-Kubba Deposition, 07/18/2016 - Exhibit 307 - 1/21/2010 Bard Memo from Jeffrey Pellicio to "Reviewers"
1823			Raji-Kubba Deposition, 07/18/2016 - Exhibit 308 - 1/4/2010 E-mail from Gin Schulz to Beasley, Raji-Kuba, Van Vleet, Doherty, and Little Re. "Potential Actions"
1824			Raji-Kubba Deposition, 07/18/2016 - Exhibit 309 - 6/10/2009 E-mail from Brian Reinkensmeyer to Bret Baird, Brian Doherty, Jack Sullivan, and Marc Aldinger Re. "Filter study Idea"
1825		9-26-18	Raji-Kubba Deposition, 07/18/2016 - Exhibit 310 - 9/1/2009 E-mail from Mike Randall Re. "0809 Filters Monthly Report.doc"
1826			Raji-Kubba Deposition, 07/18/2016 - Exhibit 311 - 2/18/2010 E-mail from Dr. Ranjith Vellody of University of Michigan to Mike Randal
1827			Raji-Kubba Deposition, 07/18/2016 - Exhibit 312 - 5/3/2009 E-mail from Raji-Kubba to Robert Carr
1828			Raji-Kubba Deposition, 07/18/2016 - Exhibit 313 - 7/14/2009 E-mail from Raji-Kubba to Mike Randall and Robert Carr
1829			Raji-Kubba Deposition, 07/18/2016 - Exhibit 314 - Packet entitled "Bard Peripheral Vascular NPD Review Meeting, March 11, 2010"
1830			Raji-Kubba Deposition, 07/18/2016 - Exhibit 315 - 1/16/2007 E-mail exchange b/w Deb Bebb and Stephanie Klocke Re. "15 and 28mm caudal summary results table", discussing the attached charts and graph on Caudal Migration Resistance Testing in 15mm and 28mm cavas.
1831			Raji-Kubba Deposition, 07/18/2016 - Exhibit 316 - Design Input Summary Report for the Denali Vena Cava Filter, DIS-8108 Rev. 00, with tracked edits

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1832			Raji-Kubba Deposition, 07/18/2016 - Exhibit 317 - 11/18/2007 E-mail from Cindi Walcott to Imtiaz Shamji Re. "FW:TrackWise Reportable Event Notification: PROD-Rec.# 149248: RF310F Detached Component"
1833			Raji-Kubba Deposition, 07/18/2016 - Exhibit 318 - 7/8/2008 E-mail from Abtihal Raji-Kubba to Mike Randall and Robert Carr Re. "FW:TrackWise Reportable Event Notification: PROD-Rec.# 180562: RF320J, Limb Detached, CMP32042"
1834			Raji-Kubba Deposition, 07/18/2016 - Exhibit 319 - 5/14/2009 E-mail from Arun Agrawal to Angela Crall Re. "Preliminary Test Results Samples Received 5/8/2009"
1835			Randall, 01/18/2017, Exhibit 534 - PowerPoint Presentation for a meeting to analyze EVEREST and MAUDE data and provide justifications for proposed changes to G2 filter
1836			Randall, 01/18/2017, Exhibit 607 - Plaintiffs' Amended Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) Re. Meridian and Denali
1837			Randall, 01/18/2017, Exhibit 608 - LinkedIn page of Mike Randall, BSME, MBA - Director of Research and Development at C.R. Bard
1838			Withdrawn - Randall, 01/18/2017, Exhibit 609 - Chart entitled "Dates re Meridian/Denali", from 2009-2014
1839			Randall, 01/18/2017, Exhibit 610 - Binder 1 of 5 for the "Meridian DHF, Project #8120", 1/18/2011

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1840			Randall, 01/18/2017, Exhibit 612 - BPV's Meridian (Eclipse Anchors) Filter GLP Animal Study Report for Project #8120 (TR-09-11-15 Rev. 0) and Summary Data Sheet from the "Caudal Migration Resistance" test in a simulated IVC diameter of 28mm
1841			Randall, 01/18/2017, Exhibit 613 - LyChron, LLC GLP Non-Clinical Study Final Report of the study "Meridian Femoral Acute GLP Animal Study Protocol" (BARD Protocol No. TP-10-09-23)
1842			Randall, 01/18/2017, Exhibit 614 - Binder 3 of 5 for the "Meridian DHF, Project #8120", 1/18/2011
1843			Randall, 01/18/2017, Exhibit 615 - Binder labeled "Stability Testing", with compilation of documents regarding stability testing
1844			Randall, 01/18/2017, Exhibit 616 - BPV's DV&V Caudal Migration Testing of Meridian and OptEase Filters, Project #8120 (TR-10-08-09)
1845			Randall, 01/18/2017, Exhibit 617 - Appendix A of Bard's Caudal Migration Resistance Force Test Method, including Original Datasheets and the Data Sheets (TM11139500 Rev. 1)
1846			Randall, 01/18/2017, Exhibit 618 - BPV's DV&V Testing for Meridian Filter and Jugular Delivery System, Project #8120 (TR-10-06-13)
1847			Randall, 01/18/2017, Exhibit 619 - Bard's Meridian Vena Cava Filter Commercialization Plan, dated 6/22/2011 (Rev. 1)
1848			Randall, 01/18/2017, Exhibit 620 - 11/15/2012 BPV Memo from Jon Conaway to DHF-8120-J and DHF-8120-F, Re. "Meridian Filter Post- Market Customer Complaint Review and Risk Assessment"

Exhibit No.	Marked for ID	Admitted in Evidence	Description
1849			Randall, 01/18/2017, Exhibit 621 - Spreadsheet entitled "Division Quality Performance Scorecard"
1850			Randall, 01/18/2017, Exhibit 622 - Bard CAPA Plan PMA Related Form for CAPA No. 12-03-01, an investigation of a higher than desired number of complaints relating to the Meridian Filters not expanding properly during deployment, to be initiated on 3/30/2012
1851			Randall, 01/18/2017, Exhibit 623 - "Alternate Conclusion" page of an unknown document, detailing the complaint rates of the Meridian filter
1852			Randall, 01/18/2017, Exhibit 624 - Meridian Lessons Learned Survey dated 6/27/2012
1853			Randall, 01/18/2017, Exhibit 625 - 12/1/2015 BPV Memo from Alicia Burns to VT-OBS-8120 Re. "Meridian Filter Discontinuance: Global Sales/Marketing Assessment", detailing that the Meridian Filter product line had not been manufactured since 8/29/2014
1854			Randall, 01/18/2017, Exhibit 627 - 4/27/2010 E-mail from Ryan Melloy to John Reviere, John Van Vleet, and Joni Creal Re. "Denali study change?", relaying that it would require approx. \$315,000 to add 50 subjects to the study (detailing the cost breakdown); Creal responded to them and added Tim Williams, relaying the survey results of physician inputs on prophylactic placement of filters in 2005 and 2008, as well as the financials from the G2/G2X Expand POA

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1855			Randall, 01/18/2017, Exhibit 628 - PowerPoint Presentation entitled "Caval Filtration of the 21st Century", by Scott O. Trerotola, M.D. at UPenn Medical Center, detailing the purpose of filters, results of PREPIC, PENN IR indications for optional filters and retrieval protocol, and providing statistics that most optional filters are never removed. Noted that broken and migrated filters was "not new", but decisions about optional vs. permanent filters and tracking down patients with optional filters was "new".
1856			Randall, 01/18/2017, Exhibit 629 - Final Pathology Report from the Denali Filter GLP Animal Study, Study ID No. 889-5, dated 10/31/2010. 12 Denali filters (6 of each version) were implanted in 12 sheep and venography was performed 4 weeks later. Summary: The Denali caused outward compression and mild tenting or distortion of the IVC and incorporation was often noted, but the Denali filter was "well tolerated in the IVC of the ovine model".
1857			Randall, 01/18/2017, Exhibit 630 - 8/23/2010 High Importance E-mail from John Van Vleet to Jim Beasley and Abtiha! Raji-Kubba Re. "Modular Study Proposal", suggesting that they approach the FDA with the long-term follow-up "buried" in the prophylactic piece and a proposal for imaging at 6 months with a clinical follow-up for AEs t 12, 18, and 24 and/or upon retrieval or observed AE. He then added Ryan Melloy and requested that Melloy recalculate the long-term cost if they eliminated the radiographic and converted those to phone screens or simple office visits for the 12, 18, and 24 month follow-ups

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1858			Randall, 01/18/2017, Exhibit 631 - 2015 Article by Kuo and Robertson entitled "Bard Denali Inferior Vena Cava Filter Fracture and Embolization Resulting in Cardiac Tamponade: A Device Failure Analysis"
1859			Randall, 01/18/2017, Exhibit 632 - Bard CAPA Request Form for CAPA No. 14-03-01, an investigation of an increasing trend in the number of "Failure to Advance" and "Deployment Issue" complaints starting in August 2013 for the Bard Denali Filter System
1860			Randall, 01/18/2017, Exhibit 633 - Binder labeled "Meridian Design History File DHF, Vol. I"
1861		9-19-18	Randall, 01/18/2017, Exhibit 634 - Binder labeled "Meridian Design History File DHF, Vol. II" <i>Page 70+38 only</i>
1862			Randall, 01/18/2017, Exhibit 635 - Binder labeled "Meridian Special 510k Traditional F10k Correspondence Clearances"
1863			Randall, 01/18/2017, Exhibit 636 - Binder labeled "Denali Design History File, Vol. I"
1864			Randall, 01/18/2017, Exhibit 637 - Binder labeled "Denali Design History File, Vol. II"
1865			Randall, 01/18/2017, Exhibit 638 - Binder labeled "Denali Post-Market Surveillance Review"
1866			Randall, 01/18/2017, Exhibit 639 - Binder labeled "Denali Traditional 510k (Part 1)"
1867			Randall, 01/18/2017, Exhibit 640 - Binder labeled "Denali Traditional 510k (Part 2)"
1868			Randall, 01/18/2017, Exhibit 641 - Binder labeled "Denali Traditional 510k (Part 3)"
1869			Randall, 01/18/2017, Exhibit 642 - Binder labeled "Denali Special 510ks Correspondence Clearances"

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1870			Randall, 02/02/2017, Exhibit 2074 - E-mail Chain, Re: Slides, Denali slide deck, 3/20/13
1871			Randall, 02/02/2017, Exhibit 2075 - E-mail Chain Re: Denali Categorization of Risks
1872			Randall, 02/02/2017, Exhibit 2076 - Design Input Summary, performance Specification for the Meridian Filter "G2/G2X/Eclipse have been shown to have undesirable caudal migration resistance ref. TD-01335."
1873			Randall, 02/02/2017, Exhibit 2078 - Analysis of Final Denali Trial Data, A Prospective, Multicenter Study of the Denali Inferior Vena Cava Filter
1874			Randall, 02/02/2017, Exhibit 2079 - E-mail Re: Meridian vs Celect 7.13.11.ppt
1875			Randall, 02/02/2017, Exhibit 2080 - E-mail Chain Re: Tiles
1876			Randall, 02/02/2017, Exhibit 2081 - E-mail Chain Re: Celect Article with Perforation Stratified
1877			Randall, 02/02/2017, Exhibit 2082 - Final Clinical Evaluator Report Denali Filter GLP Animal Study
1878			Randall, 02/02/2017, Exhibit 2083 - E-mail From Andre Chanduszeko to Mike Randall, Re: Everest and Maude Desktop
1879			Randall, 02/02/2017, Exhibit 2084 - Bard Project Plan Form
1880			Randall, 02/02/2017, Exhibit 2087 - Bard Approval Form, Vail Vena Cava Filter Concept POA
1881			Randall, 02/02/2017, Exhibit 2088 - E-mail Chain Re: Franchise Launch Update NPD Slides
1882			Randall, 02/02/2017, Exhibit 2089 - Objective of Meeting PowerPoint
1883			Randall, 02/02/2017, Exhibit 2090 - E-mail to BPV Franchise Review Teams from Rob Righi, Re: 2010 Franchise Review Meeting

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1884			Randall, 02/02/2017, Exhibit 2091 - Memorandum Re: 2011 Franchise Review - Response to Follow-up Items
1885			Rogers, 07/18/2017, Exhibit 4048 - Handwritten Notes
1886			Rogers, 07/18/2017, Exhibit 4049 - Formal Invoice
1887			Rogers, 07/18/2017, Exhibit 4050 - Curriculum Vitae of F. Rogers, MD
1888			Rogers, 07/18/2017, Exhibit 4051 - Expanded Use of Inferior Vena Cava Filters in the Trauma Population, Zolfaghari
1889			Rogers, 07/18/2017, Exhibit 4052 - List of Materials Reviewed
1890			Rogers, 07/18/2017, Exhibit 4053 - 2017 JAMA article titled "Vena Cava Filter Use in Trauma and Rates of PE, 2003-2015"
1891			Romney Deposition, 08/30/2016 - Exhibit 394 - Plaintiffs' Amended Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) Re. Bard Reach Program
1892			Romney Deposition, 08/30/2016 - Exhibit 395 - Safety Alert on the FDA Website entitled "Inferior Vena Cava (IVC) Filters: Initial Communication: Risk of Adverse Events with Long Term Use", posted 8/9/2010
1893			Romney Deposition, 08/30/2016 - Exhibit 396 - "ACHIEVE" Presentation from the 2011 Bard Peripheral Vascular National Sales Meeting on the Bard Reach Program

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1894			Romney Deposition, 08/30/2016 - Exhibit 397 - 9/15/2010 E-mail from Bret Baird to Ryan Melloy and Joni Creal Re. "Marketing Proposal", relaying that he and Bill Little were looking at the possibility of developing a software application to track optional filter patients and bring them back for retrieval; includes attachment of his preliminary proposal for this software, in preparation for the boarding meeting the following morning
1895			Romney Deposition, 08/30/2016 - Exhibit 398 - BPV Pamphlet on the Bard Reach Program
1896			Romney Deposition, 08/30/2016 - Exhibit 402 - Draft of the Action Item Update on the Recovery Filter (Gen 1) Fractures
1897			Romney Deposition, 08/30/2016 - Exhibit 404 - 3/4/2011 E-mail from Bret Baird to John Van Vleet Re. "SIR 2011 Dr. T presentation 3.4.11.ppt"
1898			Romney Deposition, 08/30/2016 - Exhibit 405 - Documents pertaining to the ISET Lunch Symposium Presentation by Frank Lynch on 1/17/2012
1899			Romney Deposition, 08/30/2016 - Exhibit 406 - BPV's Patient Guide for the "Optional Vena Cava Filter, Questions & Answers"
1900			Romney Deposition, 08/30/2016 - Exhibit 407 - Bard Idea POA for the Dual Sheath Snare Filter Retrieval Kit, POA-8347 Rev. 0, describing the introduction of a new snare retrieval kit compatible with the Meridian and Denali filters
1901			Romney Deposition, 08/30/2016 - Exhibit 408 - BPV PowerPoint Presentation entitled "Retrieval Issues: Mandatory? Elective? Complicated?"

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1902			Romney Deposition, 08/30/2016 - Exhibit 409 - 4/22/2012 E-mail from April Boone to Erica Satterblom Re. "Bard Meridian IVC Filter and Lincoln"
1903			Romney Deposition, 08/30/2016 - Exhibit 410 - 6/28/2011 E-mail from Brian Hudson to Kevin Bovee and Chad Modra Re. "Fx - Talking Points"
1904			Romney Deposition, 09/07/2016 - Exhibit 2014 - Plaintiffs' Amended Notice of Deposition Pursuant to Federal Rule of Civil Procedure 30(b)(6) Re. Marketing
1905			Romney Deposition, 09/07/2016 - Exhibit 2015 - Ms. Romney's Notebook with the cover page "30(b)(6) Sales and Marketing Deposition", including Exhibits 1-11 (396 pages total): (1) Sales and Marketing Organization Charts (2003-2016); (2) Sales Marketing 30(b)(6) Filter Position Lists Chart; (3) DOPR070010, Rev. 3 on Labeling, Advertising, and Promotion Policy; (4) Labeling, Advertising, and Promotion Policy; (5) SOPK0466500 Rev. 22 on Marketing Document Control Policy; (6) List of Marketing Materials; (7) List of Consultants; (8) Request Form for Agreements with HCPs; (9) List of 3rd Party Market Research; (10) Corporate SOP II-15, Rev. 12 (Business Travel and Expense Reimbursement); and (11) R-004 GUI - Global Labeling Guideline
1906			Romney Deposition, 09/07/2016 - Exhibit 2016 - Graphs of the Interventional Sales and Marketing Teams at the Bard Peripheral Vascular Division for each year from 2003 to 2016
1907			Romney Deposition, 09/07/2016 - Exhibit 2017 - Chart of the Marketing Supervisors (VP of Marketing, Director of Marketing, Marketing Manager, Senior Product Manager, and Product Manager) from 2003 to 2016

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1908			Romney Deposition, 09/07/2016 - Exhibit 2018 - "Guidelines and Ethics - Business Ethics Policy" article on the Corporate Governance Page of Bard's Website, amended and restated 4/12/2006
1909			Romney Deposition, 09/07/2016 - Exhibit 2020 - Bard's Regulatory Affairs Manual on Labeling, Advertising, and Promotion Policy, R-004 Rev. 2, effective 9/1/2004
1910			Romney Deposition, 09/07/2016 - Exhibit 2029 - Document entitled "Individuals Spoken to Prepare for 30(b)(6) Marketing Deposition

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1911			Romney Deposition, 09/07/2016 - Exhibit 2038 - E-mails by John Worland to jdd@jackdavislaw.com on 3/3/2011: (1) 9/25/2005 E-mail exchange b/w Joe DeJohn and John Worland Re. "Ethical Standards", regarding Worland's disappointment with C.R. Bard in not taking responsibility, specifically with the Recovery filter, as the Reps are "under the same pressure to push their products even though the products may be faulty"; "from the beginning, [the Recovery] had a migration problem" and many physicians were skeptical, until Denver Metro area sent an e-mail to stop using it ASAP. "I don't know who to believe," Bard or national research papers. (2) 8/31-9/2/2005 E-mail exchange b/w Ben Haygood and John Worland Re. "BARD IVC Filter Event Report" detailing the Rose event in which a filter rotated 80 degrees, migrated 4 cm caudally, 3 legs punctured the IVC, and head sidewalling into the vessel wall, with eventual retrieval but resulting extravasations in the puncture areas; Haygood responded that "these numbers are highly inaccurate and...to my current knowledge, there is no significant difference between the adverse events of the Recovery filter and other Vena Cava Filters".
1912		9-26-18	Romney Deposition, 09/07/2016 - Exhibit 2039 3/16/2006 E-mail from Jason Greer to Janet Hudnall
1913			Romney Deposition, 09/07/2016 - Exhibit 2043 - BPV Internal PowerPoint Presentation entitled "G2 Express Launch" for the July 2008 MS&S Training

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1914			Romney Deposition, 09/07/2016 - Exhibit 2049 - 4/30/2010 E-mail from Bret Baird to Many Re. "Filter Franchise Review Team", attaching the "2010 Filters - Surface and Gaps Homework Report"
1915			Romney Deposition, 09/07/2016 - Exhibit 2050 - "Patient Questions & Answers" Brochure for the Eclipse Filter
1916			Romney Deposition, 09/07/2016 - Exhibit 2051 - PowerPoint Presentation by Roy M. Fujitani, M.D., FASC, Chief of the Division of Vascular and Endovascular Surgery at UC Irvine, entitled "Meridian Vena Cava Filter"
1917			Romney, 01/18/2017, Exhibit 2052 - 9/25/2012 E-mail from Kim Romney to TPE-Vascular Sales Re. "Filter Facts 09.25.12", relaying the findings of the Durack et al. article (perforation in 86% of the Celect and Tulip filters, with all filters showing some degree of perforation after 71 days) and instructing that the team "know how to use it". Same day, Brian Doherty relayed that it should be going to the entire sales force, not just Peripheral or Vascular, regardless of the product.
1918			Romney, 01/18/2017, Exhibit 2053 - 3/8/2010 BPV Memo from Jim Beasley to Tim Ring Re. "Monthly Management Report", detailing the recent developments of filters (2/16/2010 phone call with FDA in position to no longer requiring a randomized trial for the prophylactic indication, the product development/launch schedule for the Eclipse and Denali IDE, and the G2X launch on 1/14/2009). Also includes 45 total MDRs in February 2010, including several filter complaints pertaining to the Recovery and G2 filters.

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1919			Romney, 01/18/2017, Exhibit 2054 - 8/30/2011 E-mail from Brian Reinkensmeyer to Bret Baird and Hans Yentz, with several CCed, Re. "Reach - solved another problem!", relaying that he had just met with the head of IR at a redacted hospital who used to be an Eclipse account, but they lost it due to caudal migration complications and since moved to Celest for retrieval and Tulip for permanent filters. Reinkensmeyer presented REACH to the doctor, which "solved a problem I had not heard of before": a poor job at getting patients back for retrievals. Bret Baird forwarded to many same day, relaying this success story about the REACH program.
1920			Romney, 01/18/2017, Exhibit 2055 - 4/11/2013 E-mail from Kim Romney to TPE-BPV Sales Re. "Filter Facts 04.11.13 SIR SPECIAL EDITION", forwarding an eBlast that Argon had sent to SIR members that day - the now available Option Elite Retrievable Filter. Romney mentioned that it was an exciting week for Optional filters at SIR, given that they were presenting clinical data on "an entirely new and completely redesigned filter", the Denali, which "comes from the largest and longest filter study to date".
1921			Romney, 01/18/2017, Exhibit 2056 - 12/3/2012 E-mail from Kim Romney forwarding Endovascular Today's publishing of the "Featured Technology article on the Meridian filter" in their November issue, "the first time in print that physicians have talked about the Meridian filter"

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1922			<p>Romney, 01/18/2017, Exhibit 2057 - 11/11/2012 High Importance E-mail from Chad Modra to Jon Conaway, requesting the filter team's position on the November filter complaints about failure to advance and deployment issues/failure to expand; Conaway replied on 11/13 that "The filter team does not have any concerns at the movement, as overall Meridian complaints have been trending down and...the subject complaints do not demonstrate extreme deviations from historical trends". Modra then replied that there were 9 Meridian complaints in October (3 deployment issues, 3 failure to expand, 2 fracture, 1 migration) and reiterated that the complaints did not trend down, but had been going up the past 4 months (includes chart of complaint trending for G2, G2X, Eclipse, and Meridian). Final message from Conaway expressed their need to determine what could be attributed to the complaint increase (i.e. any common trends between failure modes/users).</p>

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1923			Romney, 01/18/2017, Exhibit 2058 - 9/25/2012 E-mail from Jack Sullivan to TPE-Vascular Sales Re. "FW: Filter Facts 09.25.12", expressing that they were "winning all over the country with Meridian and REACH" and listing the path to "great success in the field with Meridian" (i.e. "plant seeds about Cook filters, while promoting the safety and efficacy of Meridian w/ the REACH story"... "punch Cook in the face". Mike Perko reiterated that it was "time to stop dancing around with our competitors", as "there is no better combination than Meridian and Reach"; directed the team to "get mean and nasty". On 9/26, Mike Leland e-mailed Mike Perko, having just received a call from a redacted physician, a large volume target, who had two "very adverse" outcomes with Bard filters and wanted data attached to the Meridian and a response from Bard specific to class action lawsuits. The doctor felt the Cook filter was safer and more reliable than Bard. Talk of showing testing videos showing migration with and without caudal anchors, and Leland responded on 10/3 that they were in process of getting those videos approved.
1924			Romney, 01/18/2017, Exhibit 2059 - Brochure for the Meridian Vena Cava Filter (Femoral and Jugular)

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1925			Romney, 01/18/2017, Exhibit 2060-4/25/2012 E-mail from Schyler Smith, Territory Manager for BPV in Washington-Idaho-Montana, to BJ Reed Re. "Safe Meridian Retrieval Windows", inquiring about the upper limit on the timeframe in which it is safe to attempt retrieval of the Meridian filter. Angela Crall answered, attaching the Meridian sales brochure and relaying that there "is no upper limit on the retrieval window", as the clinical trial (G2/EVEREST) showed successful retrievals out to 300 days, with several successful G2 filter retrievals with indwell of over 5 years, and they expected similar outcome for Meridian, as the Meridian titanium arm anchors improved resistance to movement in the cava (resisting tilt, migration, and penetration).
1926			Romney, 01/18/2017, Exhibit 2061 - 8/6/2014 E-mail from Schyler Smith, Field Manager for BPV in Washington-Idaho-Montana, to Kim Romney, Subject redacted, relaying that a redacted doctor had placed a Meridian in the past year and discovered at retrieval that an arm fractured, which imaging confirmed had occurred within 1 week of placement, and was now wondering if he should try to remove the filter or leave it in. Van Vleet forwarded to Treratola in a high importance e-mail on 8/7, requesting that he contact the doctor on Bard's behalf.

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1927			Romney, 01/18/2017, Exhibit 2062 - 12/17/2014 E-mail from Schyler Smith, Field Manager for BPV in Washington-Idaho-Montana, to Kim Romney Re. "Filter Questions", relaying that a redacted physician had another Meridian fracture and now wanted to do a data review. Asked Romney the national percentage of filters that are actually retrieved, the success rate of those attempted retrievals, and the SIR reported fracture rates on filters and the rate for Meridian.
1928			Romney, 01/18/2017, Exhibit 2063 - 9/8/2015 E-mail from Kim Romney and Nathan Comerferd to Laura Feinberg, no subject, attaching a Bard filter timeline of launch and discontinuation dates for all Bard filters up to the Denali filter launch in May 2013. "The Denali filter was redesigned from the ground up", as they "improved our technology". She listed the highlights of the Denali Trial, the "longest and largest IDE filter study available".
1929			Romney, 01/18/2017, Exhibit 2064 - Product Brochure of the "Denali Vena Cava Filter" - "Bard Filter Revolution"
1930			Romney, 01/18/2017, Exhibit 2065 - Brochure for Patient Q&A (*Retained by counsel)

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1931			Romney, 01/18/2017, Exhibit 2066 - 2/23/2016 High Importance E-mail from Sinead Prendergast to Sarah Cooper and Patrick Ferris Re. "FW: Denali filters", relaying that Belfast City Hospital was made aware of fracture incidents with the Denali and was surprised that Bard had not informed them of this; they now wished to do an audit of their patients who have Denali filters to assess the risks of those filters still indwelling. On 4/15/2016, Kim Romney requested that a call be set up to further discuss with Mike Randall, Director of R&D Filters.
1932			Romney, 01/18/2017, Exhibit 2067 - 8/23-9/10/2012 E-mail exchange between Dr. Frank Lynch and Mike Randall about Lynch writing a piece for Endovascular Today, which he ultimately declined on 8/27 due to his divorce. Bard wanted 2-3 of Dr. Lynch's longest implanted filter cases, which could be printed "almost like a paid advertisement section". Dr. Lynch then agreed to pursue a paper on the Meridian with his fellows to be published in a peer review journal following the SIR reporting guidelines. - On 8/23/2012, Dr. Lynch relayed that his facility had implanted 157 devices and 30 had been removed, 5 immediately because of implantation problems; their only Meridian fracture to date was placed in the SVC and removed after 44 days. His longest implant was 317 days and he had had to resort to "extra techniques" to remove a few. - On 9/10, Lynch reported that he had another Meridian fracture last week.

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1933			Romney, 01/18/2017, Exhibit 2069 - 9/20/2012 E-mail from Kim Romney to TPE-Vascular Sales Re. "Introducing Filter Facts", introducing weekly facts and trivia every Tuesday morning "to help you conquer IVC filters" and "keep winning business". This first fact: SIR guidelines definition of perforation.
1934			Romney, 01/18/2017, Exhibit 2070 - 2/5/2013 E-mail from Kim Romney to TPE-BPV Sales Re. "Filter Facts 02.05.13", with a trivia question about the four keys to a successful Meridian filter deployment (1. Know delivery system, 2. Position filter for optimal placement, 3. Pin and pull deployment action, and 4. Deploy in one smooth, continuous motion). Chad Schlee then requested any documents showing the "acceptable" levels for filter complication rates and Romney forwarded the most recent SIR guidelines on 2/6.
1935			Romney, 01/18/2017, Exhibit 2071 - 8/19/2014 E-mail from Bryan Freud to Rick Guest Re. "The Tulip would not have done this", sharing that Huntsville Hospital, which had been a go-to Gunther Tulip facility, finally agreed to evaluate Denali and today deployed 3 Denali filters, which centered great, and the doctor said "I am sold, the Tulip would not have done this". Romney responded to Freud on 8/21 that she was in Singapore supporting the Denali launch and "promised a physician...Denali won't tilt, even in the most challenging anatomy"

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1936			Romney, 01/18/2017, Exhibit 2072 - 8/17-8/18/2015 E-mail exchanges Re. "Upcoming JVIR Article". Mike Seelig, Field Manager at BPV, inquired about the filter type at issue in the JVIR September 2015 article by Hannawa et al. entitled "Percutaneous Extraction of an Embolized Intracardiac IVCF Struts Using Fused Intracardiac Ultrasound and Electroanatomic Mapping". They "don't want another Kuo". Rick Settlege determined that it included G2, Recovery, and Eclipse, but no Denali.
1937			Romney, 01/18/2017, Exhibit 2073 - 5/24/2012 E-mail from Stephanie Sands to Many Re. "SSM Filter Training", requesting 3 most common filter objections, with Rick Guest's reply that he was hearing that: Recovery had a 40% fracture rate ("now tying in Meridian with Recovery AGAIN"), while G2 and Eclipse had a 20% fracture rate; Meridian was "the same pig with lipstick", with no human studies; multiple lawsuits...
1938			Schulz Deposition, 01/30/2014 - Exhibit 1 - BPV Organizational Chart of the Management Board, as of 1/9/2005
1939			Schulz Deposition, 01/30/2014 - Exhibit 10 - 11/16/2005 "High" importance E-mail from Kellee Jones (Field Assurance Administrator at BPV) and Gin Schulz Re. "RNF Update - Request from Chris"
1940		9-20-18	Schulz Deposition, 01/30/2014 - Exhibit 11 - Chart of Adverse Events and Deaths for all competitors from Prior Evaluation through Q3 2005 and from Q4 2005 to present

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1941			Schulz Deposition, 01/30/2014 - Exhibit 12 - 11/30/2005 E-mail exchange b/w Gin Schulz and Kellee Jones re Gin, G2 v. Maude and attachments, Spread Sheet - Filter Sales (IMS Q1 '00 to Q4 '04, + Trend Q1 - Q3 '05)
1942			Schulz Deposition, 01/30/2014 - Exhibit 13 - 12/16/2005 E-mail from Cindi Walcott to Ciavarella, Schulz, Allen, and DeCant Re. "Recovery Filter Limb Fractures" the R002 Occasional range, so they needed to reassemble the BPV PAT to discuss and gauge residual risk in the number of RNFs still implanted.
1943			Schulz Deposition, 01/30/2014 - Exhibit 14 - Draft of the 4/14/2006 Memo from Natalie Wong Re. "RNF Fracture and G2 Caudal Migration update with Brian Barry"
1944			Schulz Deposition, 01/30/2014 - Exhibit 15 - 5/19/2006 E-mail from Natalie Wong to Gin Schulz and Candi Long, attaching the PowerPoint Presentation on "Recovery (Gen 1) Fracture Slides" (included in exhibit) and RNF Fracture Report (not included), updated to be current as of 5/18/2006 for the Management Review
1945			Schulz Deposition, 01/30/2014 - Exhibit 16 - 10/1/2006 E-mail from Nataile Wong to Several Re. "Fracture Docs"
1946			Schulz Deposition, 01/30/2014 - Exhibit 17 - 2/2/2006 E-mail from Gin Schulz to Several Re. "Minutes"
1947			Schulz Deposition, 01/30/2014 - Exhibit 19 - 5/10/2006 E-mail from Natalie Wong Re. "FDA Proposed Response"
1948			Schulz Deposition, 01/30/2014 - Exhibit 2 - 1/31/2006 E-mail from Gin Schulz to Mickey Graves and Natalie Wong Re. "Caudal"

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1949			Schulz Deposition, 01/30/2014 - Exhibit 21 - 6/28/2011 Email Chain from Brian Hudson to Kevin Bovee and Chad Modra Re Talking Points Including attachment
1950			Schulz Deposition, 01/30/2014 - Exhibit 4 - Meeting Summary of the IVC Filter Focus Group meeting held on 6/1/2006 in Chicago, IL at Hilton O'Hare
1951			Schulz Deposition, 01/30/2014 - Exhibit 5 - 1/31/2005 Memo from Peter Palermo to Kerry Chunko Re. "Quality Plan 2005"
1952			Schulz Deposition, 01/30/2014 - Exhibit 8 - 10/15/2004 Regulatory Affairs Manual, "Product Remedial Actions", RA-STD-002, Rev. 09
1953			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 1 - PowerPoint presentation, Ex. 1, Gin Schultz, 9/13/13 deposition
1954			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 10 - Complaint, Ex. 10, Gin Schultz, 9/13/13 deposition
1955			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 11 - FDA 3500-A, Ex. 10A, Gin Schultz, 9/13/13 deposition
1956			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 2 - E-mail with bates stamp BPVE-02-003758220-825, Ex. 2, Gin Schultz, 9/13/13 deposition
1957			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 3 - E-mail sent from Cindy Walcott, dated November 17, 2005, Ex. 3, Gin Schultz, 9/13/13 deposition
1958			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 4 - E-mail from Shari Allen to several recipients, Ex. 4, Gin Schultz, 9/13/13 deposition
1959			Withdrawn - Schulz Deposition, 09/13/2013 - Exhibit 5 - E-mail from Cindy Walcott to Dr. Ciavarella, Ex. 5, Gin Schultz, 9/13/13 deposition